

Photograph Log for EPA's December 9, 2010 Owens-Brockway Glass Container RCRA Inspection

All photographs on this log were taken with a digital camera by Amy C. Miller, RCRA Enforcement Office, EPA Region IX. Please note that each photograph number begins with "PC0901" and that the photograph log starts with photograph number 01.

27. Error
28. Error
29. Outdoor Area: 500-gallon diesel tank
30. Outdoor Area: Hazardous waste label on the 3,950-gallon used oil tank. Note: Label is faded.
31. Outdoor Area: Overview of the 3,950-gallon used oil tank.
32. Outdoor Area: 3,950-gallon used oil tank marked as "used oil".
33. Outdoor Area: Hazardous waste label on roll-off bin of furnace/checker dust. Note: the label does not have an accumulation start date.
34. Outdoor Area: Overview of the roll-off bin of furnace/checker dust.
35. Outdoor Area: Hazardous waste label on roll-off bin of furnace/check dust is modified to have an accumulation start date.
36. Outdoor Area: Bin for EP dust re-used on-site.
37. Stairwell: Trash can with lint waste.
38. Stairwell: Trash can with lint waste.
39. Stairwell: Overview of the two trash cans
40. Basement Level: 2,025-gallon used oil tank. Photograph is blurred.
41. Basement Level: 2,025-gallon used oil tank with hazardous waste label and marked as "used oil".
42. Basement Level: Close up of hazardous waste label on 2,025-gallon used oil tank. Note: no accumulation start date.
43. Basement Level: 2,025-gallon used oil tank is open on top.

63. Selecting Maintenance Area: Hazardous waste label on one of the three containers in the photograph 60.
64. Selecting Maintenance Area: Inside the flammable cabinet are a 55-gallon drum of methyl ethyl ketone and several unlabeled containers of Methyl ethyl ketone.
65. Selecting Maintenance Area: Label of the 55-gallon drum of methyl ethyl ketone in previous photograph.
66. Selecting Maintenance Area: Inside the flammable cabinet are a 55-gallon drum of methyl ethyl ketone rags and rags stored on top of the container
67. Selecting Maintenance Area: Label of the 55-gallon drum of methyl ethyl ketone rags in previous photograph. Note: the accumulation start date states "12/5/2005".
68. Universal waste and CRT Storage Area: Overview of the area.
69. Universal waste and CRT Storage Area: Close-up of lamps stored without a container.
70. Universal waste and CRT Storage Area: Close-up of lamps stored without a container.
71. 90 Day Storage Area: Open used oil 55-gallon drum.
72. 90 Day Storage Area: Close-up of label in previous photograph. Note: there is no accumulation start date.
73. 90 Day Storage Area: All empty containers except for the blue bin in the back area.
74. 90 Day Storage Area: Hazardous waste label on one of the empty containers.
75. 90 Day Storage Area: Hazardous waste label on one of the empty containers.
76. 90 Day Storage Area: All empty containers beyond the blue bin in the foreground.



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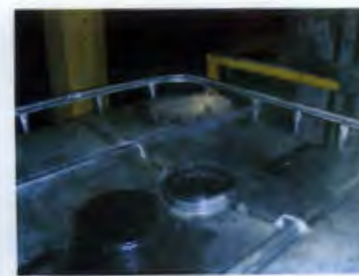
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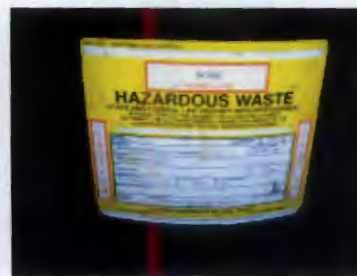
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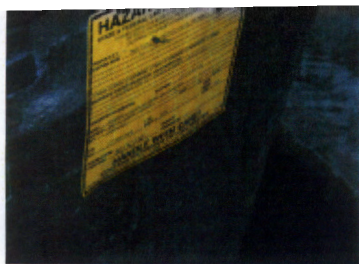
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7007 0710 0003 6240 4142

RECEIPT

(Insurance Coverage Provided)

Website at www.usps.com

USE

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William Boscacci
3600 Alameda Avenue
Oakland CA 94601-3329

PS Form 3800, August 2006

See Reverse for Instructions

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
William Boscacci
Environmental, Health & Safety Director
Owens-Broadway Galss Container Inc.
3600 Alameda Avenue
Oakland, CA 94601-3329

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X *Ray Weller* ☒ Agent ☐ Addressee

B. Received by (Printed Name) *Ray Weller* C. Date of Delivery *1-25-11*

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

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☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

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2. Article Number
(Transfer from service label)

7007 0710 0003 6240 4142

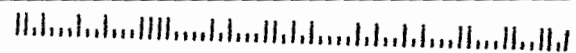
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USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Clint Seiter (WST-3)
US EPA
75 Hawthorne Street
San Francisco, CA 94105-3901





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, CA 94105-3901**

JAN 20 2011

**CERTIFIED MAIL NO. 7007-0710-0003-6240-4142
RETURN RECEIPT REQUESTED**

WARNING LETTER

William Boscacci
Environmental, Health & Safety Director
Owens-Brockway Glass Container Inc.
3600 Alameda Ave.
Oakland, CA 94601
EPA Identification Number: CAT000618918

Dear Mr. Boscacci:

On December 9, 2010, a hazardous waste compliance inspection was conducted by representatives of the United States Environmental Protection Agency ("EPA"), accompanied by a representative from the Oakland Fire Department at Owens-Brockway Glass Container Inc., located in Oakland, CA with EPA Identification Number CAT000618918. During the course of this investigation, information was gathered in accordance with Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), as amended {42 U.S.C. §6927(a)}.

A copy of the inspection report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with RCRA regulations and potential violations of the State of California authorized program under RCRA Subtitle C and potential non-RCRA state violations. Any omissions in the report shall not be construed as a determination of compliance with any other applicable regulation.

Pursuant to Section 3008 of RCRA {42 U.S.C. §6928}, you are required to correct the identified areas of noncompliance and to submit documentation of their correction to the EPA:

- Ensure that all hazardous waste containers identified in the accompanying report as improperly labeled, be labeled with the following information:
 - the words "Hazardous Waste";
 - the initial date of waste accumulation;
 - composition and physical state of the waste;

- the particular hazardous properties of the waste; and
- the name and address of the person producing the waste.

Ensure that all hazardous waste tanks identified in the accompanying report as improperly labeled, be labeled with the following information:

- the words "Hazardous Waste";
- the initial date of waste accumulation.

In addition, ensure that all tanks and containers of used oil are identified with the words "USED OIL".

Provide EPA with photos that this has been done. If the containers in question have already been transported offsite for disposal, provide EPA with a copy of the manifest;

- Ensure that all spent fluorescent lamps are secured in closed containers labeled with the words "Universal Waste-Lamps". In addition, ensure that the facility can document the length of storage time for all spent lamps;
- Ensure that all containers and tanks of hazardous waste identified in the attached report as open are closed.

Provide EPA with photos that this has been done. If the containers in question have already been transported offsite for disposal, provide EPA with a copy of the manifest;

- Perform a hazardous waste determination on oil/grease contaminated rags and personal protective equipment (PPE). Provide EPA with the results of this determination. If it is determined that these wastes are hazardous, establish a Standard Operating Procedure (SOP) for all facility personnel to discard future such wastes correctly;
- Provide documentation for all facility personnel charged with managing hazardous wastes per the requirements of the California Code of Regulations (CCR) Title 22 §66265.16(d)(1)-(4), specifically:
 - (1) the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
 - (2) a written job description for each position listed;
 - (3) a written description of the type and amount of both introductory and continuing training that will be given to each person listed above;
 - (4) records that document that the training or job experience required have been completed.
- Ensure that the facility's outdoor used oil tank has a leak detection system. Provide EPA with documentation that this has been done.

- Obtain certification from a certified, outside engineer regarding the structural integrity of the facility's three used oil tanks. Provide EPA with copies of this certification;
- Establish a system of daily inspection for all of the facility's used oil tanks, including the use of a daily inspection check sheet;
- Provide access to the 55-gallon drum of spent lubricant in the Selecting Maintenance Satellite Accumulation Area #1.
- Provide EPA with photographic documentation that this has been done. If the containers in question have already been transported offsite for disposal, provide EPA with a copy of the manifest.

Documentation of your return to compliance may consist of, among other things, photographs, manifests, and revised records. Where compliance cannot be achieved within 30 calendar days, you must provide to the EPA the reasons for the delay, a description of each corrective action planned, and a schedule on which each corrective action will be taken.

By copy of this letter, the EPA is providing the State of California with notice that the EPA may take appropriate enforcement action if the facility does not resolve the violations within the time specified above, and the State of California does not take appropriate enforcement action. The State of California may notify the EPA of its intent to assume or decline responsibility to take such action to resolve the referenced RCRA Subtitle C violations.

The EPA reserves the right to take further enforcement action as it deems appropriate. However, your response to this letter will be considered in determining the need for further enforcement action. RCRA Subtitle C violations such as those listed in the Enclosure may be punishable by civil and criminal actions, including penalties of up to \$37,500 per day for each violation, as provided by Section 3008 of RCRA.

The EPA routinely provides copies of inspection reports to state or tribal agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations, 40 C.F.R. Part 2, Subpart B. For any portion of the information included in this inspection report which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. §2.203(b). If the EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. §2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. As described in 40 C.F.R. §2.203(a)(2), the EPA will construe the failure to furnish a confidentiality claim within 14 calendar days from the date of your receipt of this letter as a waiver of that claim, and information may be made available to the public by the EPA without further notice.

Your certification of correction of the areas of noncompliance identified in this warning letter must be included in a response letter signed by a duly authorized official of your facility. Your response, due 30 calendar days from the date of your receipt of this letter, shall be addressed to:

Clint Seiter
Mailcode: WST-3
RCRA Enforcement Office
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

If you have questions related to the inspection report or this letter, please contact Clint Seiter or my staff at (415) 972-3298 or seiter.clint@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy C. Miller', with a stylized flourish at the end.

Amy C. Miller, Manager
RCRA Enforcement Office

Enclosure

cc (w/o enclosure): Charles McLaughlin, DTSC
Leroy Griffin, Oakland Fire Department



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

WASTE MANAGEMENT DIVISION

RCRA ENFORCEMENT OFFICE

Purpose: RCRA Compliance Evaluation Inspection

Facility: Owens-Brockway Glass Container Inc.
3600 Alameda Ave.
Oakland, CA 94601

EPA ID Number: CAT000618918

Date of Inspection: December 9, 2010

EPA Representatives: Clint Seiter
(415) 972-3298
seiter.clint@epa.gov

Amy Miller
(415) 947-4198
miller.amy@epa.gov

Oakland Fire Department
CUPA representative:

Leroy Griffin
(510) 238-7759
lgriffin@oaklandnet.com

Facility Representative: William Boscacci
Environmental, Health & Safety Director
(510) 436-2166

Report Prepared By: Clint Seiter

Report Date: January 11, 2011

BACKGROUND

Facility Description

Owens-Brockway Glass Containers ("Owens-Brockway" or "the facility"), a unit of Owens-Illinois, is a glass manufacturing facility located at 3600 Alameda Avenue, Oakland, CA 94601. It has been in operation since 1937 and currently has a work force of 180 employees. The facility has three furnaces, but at the present only one is in operation (approximately 700,000 bottles are manufactured daily). Most of the bottles manufactured come from recycled glass (cullet), which is ground down and remelted, with the remainder glass made on site from silica sand mixed with salt cake, soda ash, limestone, and colorizers or de-colorizers.

A review of the California Department of Toxic Substance Control's (DTSC) Hazardous Waste Tracking System database indicates that Owens-Brockway is a large quantity generator of lead D008 (lead) and D010 (selenium) RCRA hazardous waste.

Owens-Brockway was last inspected by the City of Oakland Fire Department on October 19, 2004. Generator related violations were noted during that inspection, and the facility was documented as having returned to compliance on February 24, 2005.

Per the facility's 2009 Biennial Report, Owens-Brockway generates the following hazardous waste streams:

Hazardous Waste Name	Hazardous Waste Code
Electrostatic precipitator dust	D006/D007/D008/D010/ CA135
Electrostatic precipitator rinsate	D007/D008/CA135
Ignitable spent solvent and ink, methyl ethyl ketone (MEK)	D001/D035/F005/ CA214

MANUFACTURING PROCESS

The glass is manufactured from a combination of raw materials (sand, limestone, soda ash, sodium carbonate and sodium sulfate) and cullet (reusing cullet is desirable because this reduces the melting point of the batch, resulting in lower energy consumption). Both the cullet (segregated by color) and the raw materials are stored in individual silos above a weighing container. Different glass products require different combinations of ingredients and the required proportions of each batch are adjusted accordingly. The batches are transported via closed conveyor belts to the facility furnaces, where the batch material is melted down to molten glass (the conveyor belts are vacuumed daily and the vacuumed dust is re-entered into the manufacturing process). The molten glass is drawn from the bottom of the furnace, via the throat to feeders. Dust contaminated with chromium and lead (from crushed cullet) accumulates on the

bottom of the exhaust chambers that flank the furnaces (approximately once every three years this dust is vacuumed out and shipped off to be disposed of as D007 and D008 hazardous waste). Orifices in the feeders control the amount of molten glass let through, and shears cut off the bottoms of the gobs (discreet units of molten glass) to the desired length. The gobs are funneled to forming machines (the facility currently has three active forming machines, with two other machines being idle), and formed into blanks, called "parisons". The parisons are then transferred into molds (two at a time) in machines called shops. The hot glass is quenched by water as it is ejected out of the shop. This water picks up lubricating oil from the shop machinery, and before the water is recycled, it is directed to a skim pond. Used oil is skimmed off the pond and diverted to an above-ground tank. The molds in each shop can be configured to whatever specifications are required for the particular bottle, and the molds are periodically cleaned via bead blasting. Bottles are formed when compressed air is blown into the molds containing the gobs. The bottles then go through an annealing process where they are reheated in lehrs (specialized, temperature-controlled kilns) to temperatures up to 1030 degrees and then gradually cooled down. After the bottles are sufficiently cooled, they are sprayed with a poly-coat mixture that increases the bottles' lubricity (scratch resistance). Each bottle is then imprinted with an ink code from an ink jet. The ink jets are periodically cleaned with methyl ethyl ketone (MEK) solvent, and the spent solvent eventually is discarded as a RCRA hazardous waste. The bottles are then checked by means of optical equipment for various potential defects (irregular wall thickness, blisters, cracks, specks, etc.) and defective bottles are removed from the assembly line (to be recycled as cullet). The bottles that pass inspections are eventually packaged and transported off to the customers.

INVESTIGATION

The purpose of the investigation was to determine Owens-Brockway's compliance with applicable federal environmental statutes and regulations, and, in particular, RCRA, as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268, 273 and 279, and the California Code of Regulations (CCR), Title 22, Division 4.5 and the California Health and Safety Code, Division 20. On December 9, 2010, Clint Seiter and Amy Miller, representing the U.S. EPA, accompanied by a representative from the City of Oakland Fire Department, conducted an unannounced site investigation at the Owens-Brockway facility in Oakland, CA (EPA # CAT000618918). Upon providing introductions and credentials, the inspectors contacted Mr. William Boscacci, the environmental, health and safety director. The inspectors explained that this was a routine inspection to determine whether or not the facility was in compliance with federal and state regulations concerning the proper management of RCRA and non-RCRA hazardous wastes. The inspection would consist of a walkthrough of the facility, focusing on those areas where hazardous wastes were handled or stored, with photos taken, followed by a record review and a post-inspection outbriefing. In the course of the pre-walkthrough briefing, the inspectors provided Mr. Boscacci with a copy of the EPA Small Business Resources Information Sheet.

WALK-THROUGH INSPECTION

Outside used oil tank

The inspectors noted a 3950-gallon used oil tank located outside of the facility's main building (used oil is a non-RCRA, California only hazardous waste). Although the tank had a hazardous waste label, the label had faded to the point that it was essentially unreadable (Photo 1). The tank was clearly marked with the words "Used Oil", per regulatory requirements (Photo 2).



Photo 1: used oil tank's unreadable label



Photo 2: "USED OIL" label on used oil tank

The tank had adequate secondary containment but lacked a leak detection system. The facility representative informed the inspectors that the tank was inspected daily per the regulatory tank

Furnace checker dust bin

[illegible]

EP Building

4



Photo 5: bin of EP dust awaiting recycling

Batch House: C Furnace Area

The raw materials and cullet are combined here per the specified proportions for a given batch of glass. The inspectors noted the following:

- Two open, unlabeled trash containers in the stairwell. Inside each container were what appeared to be oily rags (Photos 6 and 7), which, if sufficiently saturated could be considered a non-RCRA, California only hazardous waste. The inspector requested that the facility representative have a hazardous waste determination made for this waste stream to ensure that non-RCRA hazardous wastes were not being improperly discarded.



Photo 6: trash containers with discarded rags



Photo 7: close up shot of discarded rags

- Basement Area: glass constituents in the given specified proportions are gravity fed from the silos onto a conveyor belt here. Oily water from the quench water bins is processed through an oil/water separator, and the generated used oil is pumped to two interior

2025-gallon above-ground used oil tanks. The two tanks are located on a concrete floor which appeared to be in good condition (i.e., showed no signs of cracks). The tanks are elevated approximately three inches above the concrete floor on one end and had adequate containment. Both tanks were properly marked with the words “USED OIL” and had hazardous waste labels (Photo 8). However, in both cases, the printing on the label had faded to the point where it was barely legible (Photo 9). As with the previously described used oil tank, no written logs were kept of daily inspections. In addition, the facility representative was not able to produce an engineer’s certification of the tanks’ structural integrity.



Photo 8: used oil tank



Photo 9: label close-up

- Near the facility furnace was a bin for spent blast grit, a non-RCRA, California only hazardous waste (Photos 10 and 11). The bin was closed and properly labeled. No violations were noted.



Photo 10: blast grit bin

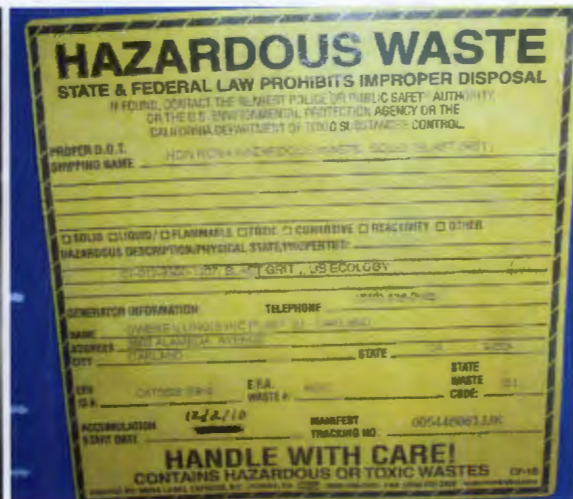


Photo 11: label close-up

- Adjacent to the spent blasting grit bin was a satellite accumulation area with a 55-gallon drum of used oil. The drum was labeled but the label was unreadable (Photo 12).



Photo 12: satellite accumulation container of used oil with unreadable label

- The inspectors noted a bin for contaminated rags and personal protective equipment (PPE). The rags and PPE are sent to an industrial laundry for cleaning and then returned to the facility. Per the California Health and Safety Code, dirty rags are exempt from regulation if they are managed correctly and picked up for laundering by an industrial laundry service. No violations were noted.
- Near the rag bin were two 55-gallon satellite accumulation drums (Photo 13). One contained used oil, the other, oil-contaminated swab heads. The used oil container had an unreadable label while the swab head container had no label. Both containers had open bungs (Photo 14).



Photo 13: two open 55-gallon satellite accumulation containers



Photo 14: close up of open bung

Batch House: D and E Furnace Area

The inspectors noted the following:

- An unlabeled, open 55-gallon container of discarded PPE (gloves, coveralls, etc.) that appeared to be contaminated with grease or oil (Photo 15). Adjacent to this container was an unlabeled, open drum containing a mixture of trash and contaminated PPE (Photo 16). The facility representative was not able to verify at the time whether or not the contaminated PPE in both containers was a non-RCRA, California only hazardous waste.



Photo 15: two open unlabeled drums Photo 16: interior shot of the second drum containing discarded PPE

- One trash can for non-hazardous waste, containing what appeared to be oil-contaminated PPE (Photo 17). The inspectors requested that the facility representative make a hazardous waste determination for PPE and rags that are contaminated with oil to ensure that a non-RCRA California only waste is not improperly discarded with non-hazardous trash.



Photo 17: trash can with soiled PPE

The inspectors noted the following:

- # HAZARDOUS WASTE
- STATE & FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
- IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY,
OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE
CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL
- PROPER D.O.T.
SHIPPING NAME NON RCRA HAZARDOUS WASTE LIQUID ONLY
- ☐ SOLID ☐ LIQUID ☐ FLAMMABLE ☐ TOXIC ☐ CORROSIVE ☐ REACTIVITY ☐ OTHER
- HAZARDOUS DESCRIPTION/PHYSICAL STATE/PROPERTIES:
229794 001 DENVEND PERSON
- GENERATOR INFORMATION: TELEPHONE (510) 430-2185
- NAME OWENS ILLINOIS INC PLANT 20 - OAKLAND
ADDRESS 3800 ALAMEDA AVENUE
CITY OAKLAND STATE CA ZIP 94612
- EPA ID # CAT000610518 E.P.A. NON WASTE #
- ACCUMULATION START DATE MANIFEST TRACKING NO.
- HANDLE WITH CARE!**
CONTAINS HAZARDOUS OR TOXIC WASTES
- PRINTED BY: ARAC LABOR SERVICES, INC. POWAY, CA (619) 590-6666 FAX (619) 590-6666

9

- One 55-gallon drum of spent aerosol cans, closed and labeled correctly;
- One 55-gallon drum of contaminated rags, closed and labeled correctly;
- One 55-gallon drum of spent lubricant. The drum was closed and labeled correctly, but there was no access to it since the other drums were in front of it.

Selecting Maintenance Satellite Accumulation Area #2

The inspectors noted the following:

- One 55-gallon drum of spent MEK. Although the drum was closed and labeled correctly, there was an unlabeled quart container of spent MEK on top of the drum (Photo 20).



Photo 20: Drum of spent MEK with unlabeled quart bottle of MEK on top

- One 55-gallon drum of rags with MEK ink. The drum was closed and labeled, but its accumulation start date was entered as 12/5/2005 (Photo 21) (the facility representative said that this was an incorrect date). In addition there was a pile of dirty rags and a spent aerosol can on top of the drum (Photo 22).

HAZARDOUS WASTE 05-144

STATE AND FEDERAL LAW PROHIBIT IMPROPER DISPOSAL.
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY, THE U.S. ENVIRONMENTAL PROTECTION AGENCY
OR THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.

GENERATOR INFORMATION:

NAME OWENS-BROCKWAY GLASS CONTAINERS, INC.
ADDRESS 1000 Alameda Avenue CITY Oakland STATE CA ZIP 94601
PHONE (510) 426-2100
EPA ID NO. / MANIFEST DOCUMENT NO. CAT000018918
EPA WASTE NO. 0001500200010 CA WASTE NO. 352 ACCUMULATION START DATE 12/5/2005
CONTENTS, COMPOSITION: RAGS WITH MEK INK AND SOLVENT
SELECTING MAINTENANCE BOTTLE PRINTER MAINTENANCE
PHYSICAL STATE: ☒ SOLID ☐ LIQUID HAZARDOUS PROPERTIES: ☒ FLAMMABLE ☒ TOXIC
☐ CORROSIVE ☐ REACTIVITY ☐ OTHER

SATELLITE ACCUMULATION

D.D.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

STYLE CHROMACOR

LABORATORY # (800) 625-5000 www.echelon.com

Photo 21: spent MEK drum label with incorrect satellite accumulation date.



Photo 22: 55-gallon drum of used MEK with a pile of dirty rags and a spent aerosol on top.

Universal Waste Storage Area

The inspectors noted spent fluorescent lamps in the area that were not being stored in containers. There were also spent lamps in unlabeled boxes, but the boxes were open, with the lamps sticking out (Photos 23 and 24).



Photos 23 and 24: uncontainerized or partially containerized spent fluorescent lamps

Hazardous Waste Storage Area

At the time of the inspection, there were only empty 55-gallon drums in the designated hazardous waste storage area. No violations were noted.

Record Review

RCRA

Manifests and LDR Notification forms: Manifests and LDR notification forms dating from 2008 to 2010 were reviewed. No violations were noted.

Contingency Plan: No violations were noted

Training: The facility representative was able to provide documentation of annual refresher training. However, the facility did not have the training records required under CCR Title 22 §66265.16(a) through (d), specifically:

- 1) the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
- 2) a written job description for each position listed;
- 3) a written description of the type and amount of both introductory and continuing training that will be given to each person listed above;

4) records that document that the training or job experience required have been completed.

Weekly Inspections: The inspectors reviewed the facility's weekly inspection logs. No violations were noted.

-**Area of Concern:** although the logs indicated that the facility's waste storage areas were being inspected weekly, the inspectors noted numerous instances during the course of the inspection where hazardous waste labels had faded to the point of being unreadable. When performing these weekly inspections, facility personnel should pay particular attention to the legibility of the hazardous waste containers' labels.

Daily Tank Inspections: The facility had not set up a formal system for inspecting its hazardous waste tanks on a daily basis.

Tank Engineering Certification: The facility representative was not able to provide to the inspectors certifications by a qualified, outside engineer regarding the structural integrity of its hazardous waste tanks.

Biennial Report: No violations

POTENTIAL RCRA VIOLATIONS

<p>Hazardous Waste Storage Area Labeling Requirements</p> <p>Title 22 §66262.34(a)(3) and (f) (40 CFR §262.34(a)(2) and (3))</p>	<p>Each container used for onsite accumulation of hazardous waste shall be labeled with the following information:</p> <ul style="list-style-type: none"> - the words “Hazardous Waste”; - the initial date of waste accumulation; - composition and physical state of the waste; - the particular hazardous properties of the waste; - the name and address of the person producing the waste. <p>The accumulation start date on the hazardous waste label for the outdoor checker dust bin had faded to illegibility (corrected during the inspection).</p>
<p>Satellite Accumulation Area Labeling Requirements</p> <p>Title 22 §66262.34(e)(1)(E) and (f)(3) (40 CFR §262.34(c)(1))</p>	<p>Generators who accumulate hazardous waste on site without a permit or grant of interim status shall comply with the following requirements:</p> <ul style="list-style-type: none"> (1) the date upon which each period of accumulation begins shall be clearly marked and visible for inspection on each container; (2) the date the applicable accumulation period begins, and (3) each container and tank used for onsite accumulation of hazardous waste shall be labeled or marked clearly with the words, “Hazardous Waste.” Additionally, all containers shall be labeled with the following information: <ul style="list-style-type: none"> (A) composition and physical state of the wastes; (B) statement or statements which call attention to the particular hazardous properties of the waste (e.g.,

	<p>flammable, reactive, etc.); (C) name and address of the person producing the waste.</p> <ul style="list-style-type: none"> - A 1-quart container of spent MEK in the Selecting Maintenance Satellite Accumulation Area #1 was unlabeled; - One 55-gallon container of discarded MEK contaminated rags had an incorrect satellite accumulation date.
<p>Used Oil Labeling</p> <p>Title 22 §66279.21(b) (40 CFR §279.22(c))</p>	<p>Containers and aboveground tanks used to store used oil and fill pipes used to transfer used oil into underground storage tanks shall be marked or clearly labeled with the words "USED OIL."</p> <p>The following used oil containers/tanks were not marked with the words "USED OIL":</p> <ul style="list-style-type: none"> - One 55-gallon drum of used oil in the C Furnace Area; - One 55-gallon drum of used oil in the Selecting Maintenance Satellite Accumulation Area #1.
<p>Universal Waste – Containers</p> <p>Title 22 §66273.33(b)(1) (40 CFR §273.33(d)(1))</p>	<p>A universal waste handler shall contain any lamp in a container or package that is structurally sound, adequate to prevent breakage, and compatible with the contents of the lamp. Such a container or package shall remain closed and shall lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.</p> <p>Spent fluorescent lamps stored in the facility's universal waste storage area were in open containers or not containerized at all.</p>

<p>Universal Waste – Labeling</p> <p>Title 22 §66273.34(c) (40 CFR §273.34(e))</p>	<p>Lamps (i.e., each lamp), or a container or package in which the lamps are contained, shall be labeled or marked clearly with the following phrase: "Universal Waste-Lamp(s)".</p> <p>The discarded spent fluorescent lamps in the facility's universal waste storage area were not labeled.</p>
<p>Universal Waste – Accumulation Start Date</p> <p>Title 22 §66273.35(b) (40 CFR §273.35(b))</p>	<p>A universal waste handler shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it became a waste or was received.</p> <p>The discarded fluorescent lamps in the facility's universal waste storage area did not have accumulation start dates.</p>
<p>Training: Job Title and Description</p> <p>Title 22 §66265.16(d)(1)-(4) (40 CFR §265.16(d)(1-4))</p>	<p>Title 22 §66265.16(d)(1-4) requires that a generator maintain the following training records:</p> <ul style="list-style-type: none"> (1) the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; (2) a written job description for each position listed; (3) a written description of the type and amount of both introductory and continuing training that will be given to each person listed above; (4) records that document that the training or job experience required have been completed. <p>The facility did not have these records.</p>

POTENTIAL NON-RCRA, CALIFORNIA ONLY VIOLATIONS

<p>Hazardous Waste Storage Area Labeling Requirements</p> <p>Title 22 §66262.34(a)(3) and (f)</p>	<p>Each tank used for onsite accumulation of hazardous waste shall be labeled with the following information:</p> <ul style="list-style-type: none"> - the words “Hazardous Waste”; - the initial date of waste accumulation: <ul style="list-style-type: none"> - The hazardous waste label of the exterior 3950-gallon tank of used oil was faded to illegibility; - The hazardous waste labels of the 2025-gallon tanks of used oil in the C Furnace area were faded to illegibility.
<p>Satellite Accumulation Area Labeling Requirements</p> <p>Title 22 §66262.34(e)(1)(C); Title 22 §66262.34(e)(1)(E), (f)(3)</p>	<p>A generator may accumulate as much as 55 gallons of hazardous waste at or near any point of generation if each container used for onsite accumulation is labeled with the words “Hazardous Waste” and with the following information:</p> <ul style="list-style-type: none"> - the initial date of waste accumulation is clearly marked and visible for inspection on each container used for accumulation of hazardous waste; - composition and physical state of the waste; - the particular hazardous properties of the waste; - the name and address of the person producing the waste. <ul style="list-style-type: none"> - The two satellite accumulation 55-gallon drums (used oil and oil-contaminated swab heads) in the C Furnace Area were unlabeled; - The 55-gallon satellite accumulation

	<p>container of used oil adjacent to the spent blast grit bin had an unreadable label;</p> <ul style="list-style-type: none"> - The label of the 55-gallon satellite accumulation container of used oil in the Selecting Maintenance Area lacked an accumulation start date.
<p>Open Containers</p> <p>Title 22 §66265.173(a) (Article 9)</p>	<p>Title 22 §66262.34(a)(1)(A) states that a generator may accumulate hazardous waste on-site without a permit provided that the generator complies with the applicable requirements of article 9 of chapter 15.</p> <p>Title 22 §66265.173(a) (Article 9) states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.</p> <p>Two 55-gallon satellite accumulation containers in the C Furnace Area had open bungs.</p>
<p>Lack of Aisle Space</p> <p>Title 22 §66265.35</p>	<p>Title 22 §66262.34(a)(4) states that a generator may accumulate hazardous waste on-site without a permit provided that the generator complies with the applicable requirements of article 3 of chapter 15.</p> <p>Title 22 §66265.35 (Article 3) states that the owner or operator (of a facility that generates hazardous waste) shall maintain aisle space to allow the unobstructed movement of personnel and equipment.</p> <p>One 55-gallon drum of spent lubricant in the Selecting Maintenance Satellite Accumulation Area #1 lacked access.</p>
<p>Failure To Make a Hazardous Waste Determination</p>	<p>A person who generates a waste shall determine if that waste is a hazardous waste.</p>

<p>Title 22 §66262.11(a) and (b)</p>	<p>Throughout the facility there were instances of dirty rags and PPE being discarded with non-hazardous trash, although no determination had been made as to whether or not they were non-RCRA hazardous wastes.</p>
<p>Tanks: Certification</p> <p>Title 22 §66265.191(a)</p>	<p>Title 22 §66262.34(a) states that a generator may accumulate hazardous waste on-site without a permit provided that the generator complies with the applicable requirements of article 10 of chapter 15.</p> <p>Title 22 §66265.191(a) (Article 10) states that the facility owner must keep on file at the facility a written assessment reviewed and certified by an independent, qualified, professional engineer, that attests to the tank system's integrity.</p> <p>The facility was not able to provide engineering certification of the structural integrity of the facility's three used oil tanks.</p>
<p>Tanks: Leak Detection System</p> <p>Title 22 §66265.193(c)(3)</p>	<p>Title 22 §66265.193(c)(3) (Article 10) states that hazardous waste tanks must be provided with a leak detection system.</p> <p>The facility's outdoor 3950-gallon used oil tank did not have a leak detection system.</p>
<p>Tanks: Daily Inspection</p> <p>Title 22 §66265.195(a)</p>	<p>The owner or operator must inspect at least once each operating day data gathered from monitoring and leak detection equipment.</p> <p>The facility did not have a formal daily tank inspection system implemented.</p>

Photograph Log for EPA's December 9, 2010 Owens-Brockway Glass Container RCRA Inspection

All photographs on this log were taken with a digital camera by Amy C. Miller, RCRA Enforcement Office, EPA Region IX. Please note that each photograph number begins with "PC0901" and that the photograph log starts with photograph number 090.

- 27. Error
- 28. Error
- 29. Outdoor Area: 500-gallon diesel tank
- 29a. Lower resolution version
- 30. Outdoor Area: Hazardous waste label on the 3,950-gallon used oil tank. Note: Label is faded.
- 30a. Cropped version
- 31. Outdoor Area: Overview of the 3,950-gallon used oil tank.
- 32. Outdoor Area: 3,950-gallon used oil tank marked as "used oil".
- 32a. Cropped version
- 33. Outdoor Area: Hazardous waste label on roll-off bin of furnace/checker dust. Note: the label does not have an accumulation start date.
- 33a. Cropped version
- 34. Outdoor Area: Overview of the roll-off bin of furnace/checker dust.
- 34a. Cropped version
- 35. Outdoor Area: Hazardous waste label on roll-off bin of furnace/check dust is modified to have an accumulation start date.
- 36. Outdoor Area: Bin for EP dust re-used on-site.
- 36a. Lower resolution version
- 37. Stairwell: Trash can with lint waste.
- 37a. Cropped version

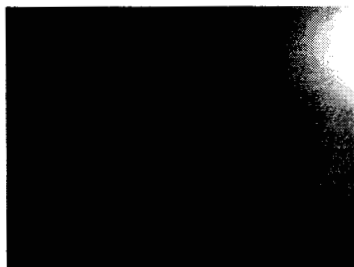
- 38. Stairwell: Trash can with lint waste.
- 38a. Lower resolution version
- 39. Stairwell: Overview of the two trash cans
- 39a. Cropped version
- 40. Basement Level: 2,025-gallon used oil tank. Photograph is blurred.
- 41. Basement Level: 2,025-gallon used oil tank with hazardous waste label and marked as "used oil".
- 41a. Lower resolution version
- 42. Basement Level: Close up of hazardous waste label on 2,025-gallon used oil tank. Note: no accumulation start date.
- 42a. Cropped version
- 43. Basement Level: 2,025-gallon used oil tank is open on top.
- 44. Near Furnace Area: spent blast grit bin.
- 44a. Lower resolution version
- 45. Near Furnace Area: Hazardous waste label on spent blast grit.
- 45a. Cropped version
- 46. Near Furnace Area: Used oil container. Facility representative stated it was not waste, but rather used on site. Image is blurred.
- 47. Near Furnace Area: Same as previous photograph.
- 48. Near Furnace Area: Close-up of the top of the container in the previous photograph.
- 49. Near Furnace Area: Close-up of the label on the container in photograph 47.
- 50. C-Tank Satellite Accumulation Area: Hazardous waste label on 55-gallon drum of used oil. Note: label was faded.
- 50a. Cropped version
- 51. C-Tank Satellite Accumulation Area: Open bin of contaminated gloves.

52. C-Tank Satellite Accumulation Area: Hazardous waste label on the container in the previous photograph.
53. C-Tank Satellite Accumulation Area: Two open top 55-gallon drums of used oil adjacent to the bin of contaminated gloves.
- 53a. Lower resolution version
54. C-Tank Satellite Accumulation Area: Same as previous photograph.
55. C-Tank Satellite Accumulation Area: Close up of the open top of the container in the previous photograph.
- 55a. Lower resolution version
56. D and E Area: Open top can of contaminated gloves.
57. D and E Area: Contents of the can in the previous photograph.
- 57a. Lower resolution version
58. D and E Area: Trash can.
59. D and E Area: Contaminated gloves inside trash can in previous photograph.
- 59a. Lower resolution version
60. Selecting Maintenance Area: Overview of satellite accumulation area.
- 60a. Lower resolution version
61. Selecting Maintenance Area: Hazardous waste label for used oil on one of the three containers in the previous photograph. Note: the label does not have an accumulation start date.
- 61a. Cropped version
62. Selecting Maintenance Area: Hazardous waste label on one of the three containers in the photograph 60.
63. Selecting Maintenance Area: Hazardous waste label on one of the three containers in the photograph 60.
64. Selecting Maintenance Area: Inside the flammable cabinet are a 55-gallon drum of methyl ethyl ketone and several unlabeled containers of Methyl ethyl ketone.

- 64a. Lower resolution version.
- 65. Selecting Maintenance Area: Label of the 55-gallon drum of methyl ethyl ketone in previous photograph.
- 66. Selecting Maintenance Area: Inside the flammable cabinet are a 55-gallon drum of methyl ethyl ketone rags and rags stored on top of the container
- 67. Selecting Maintenance Area: Label of the 55-gallon drum of methyl ethyl ketone rags in previous photograph. Note: the accumulation start date states "12/5/2005".
- 67a. Cropped version
- 68. Universal waste and CRT Storage Area: Overview of the area.
- 69. Universal waste and CRT Storage Area: Close-up of lamps stored without a container.
- 69a. Cropped version
- 70. Universal waste and CRT Storage Area: Close-up of lamps stored without a container.
- 70a. Cropped version
- 71. 90 Day Storage Area: Open used oil 55-gallon drum.
- 72. 90 Day Storage Area: Close-up of label in previous photograph. Note: there is no accumulation start date.
- 73. 90 Day Storage Area: All empty containers except for the blue bin in the back area.
- 74. 90 Day Storage Area: Hazardous waste label on one of the empty containers.
- 75. 90 Day Storage Area: Hazardous waste label on one of the empty containers.
- 76. 90 Day Storage Area: All empty containers beyond the blue bin in the foreground.



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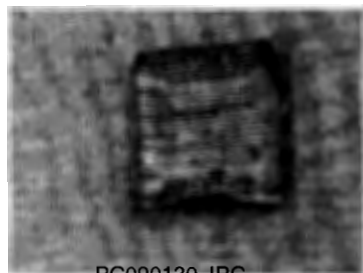
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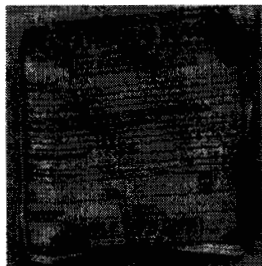
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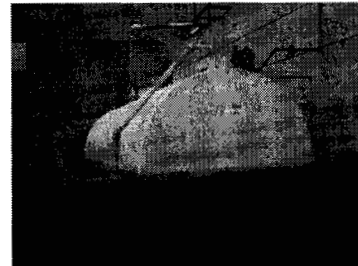
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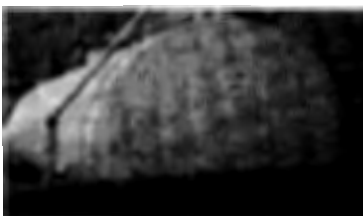
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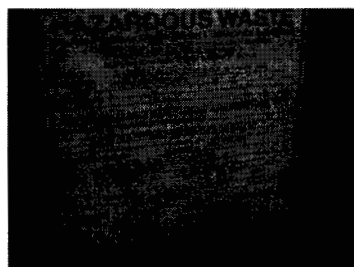
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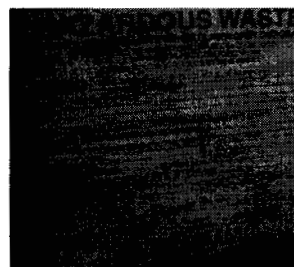
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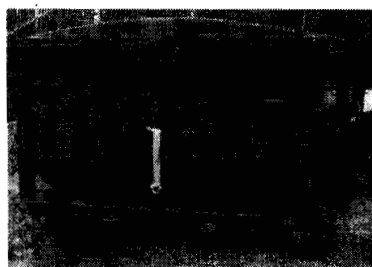
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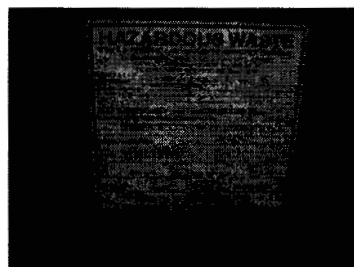
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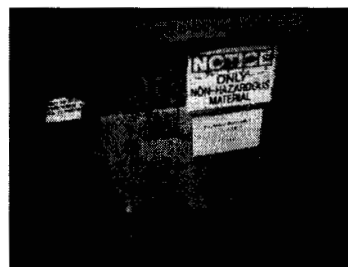
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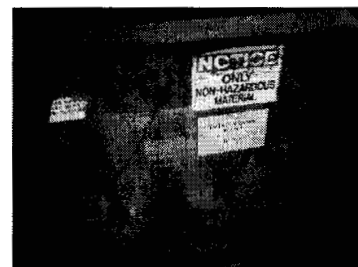
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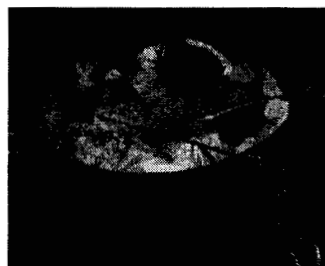
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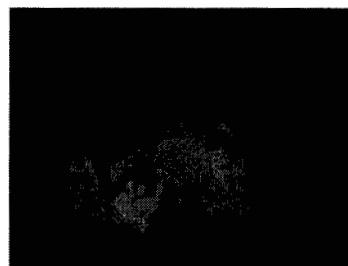
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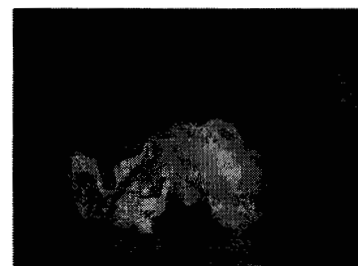
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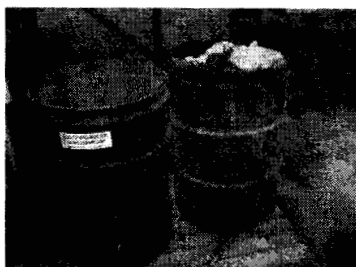
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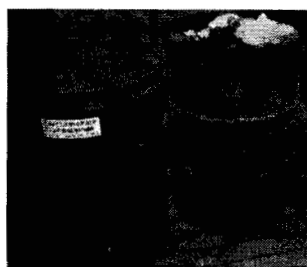
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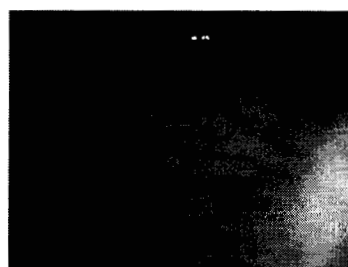
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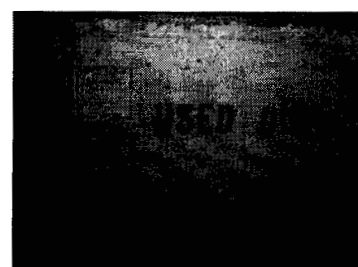
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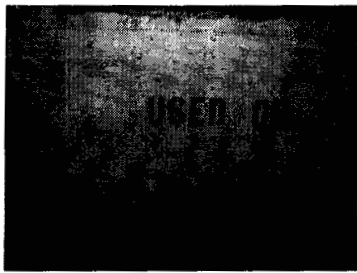
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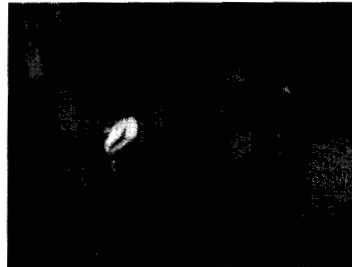
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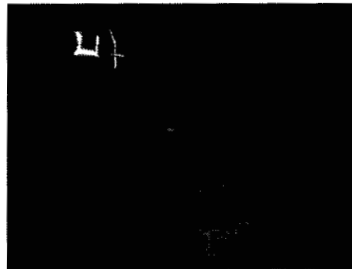
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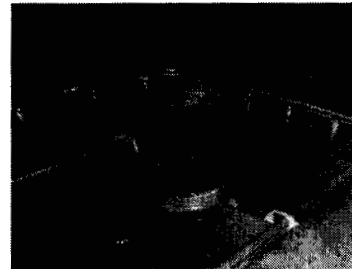
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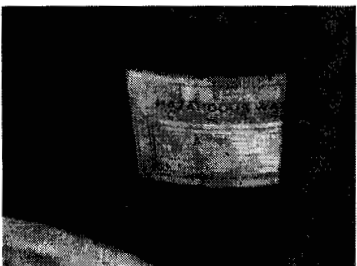
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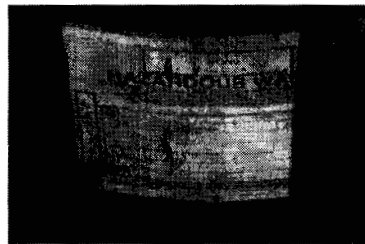
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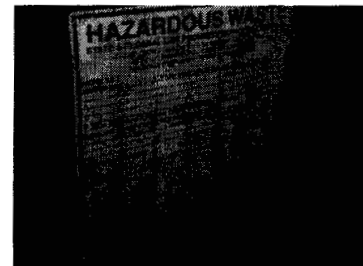
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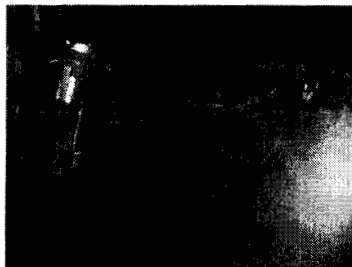
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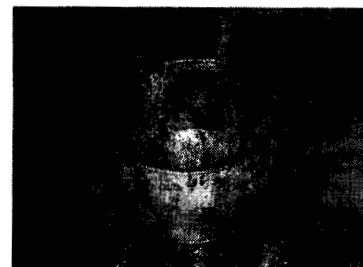
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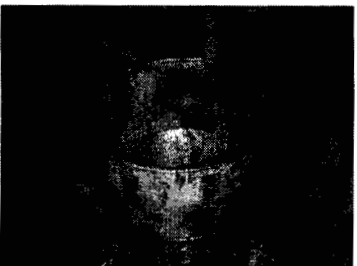
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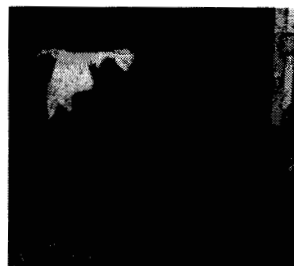
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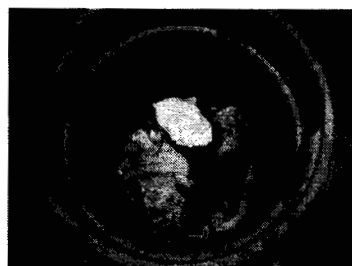
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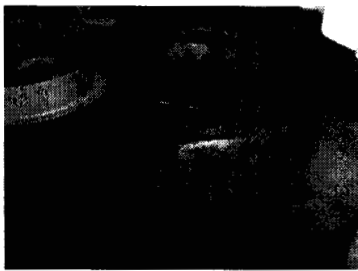
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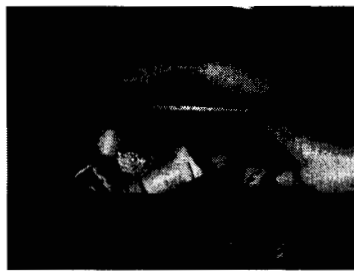
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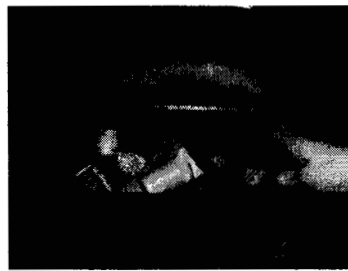
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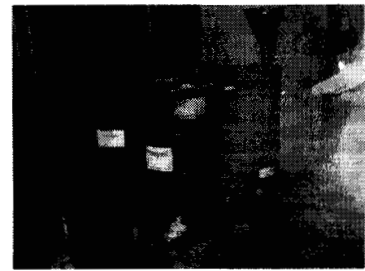
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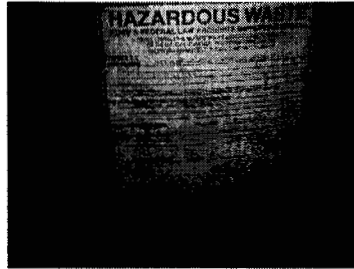
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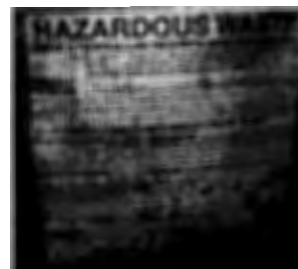
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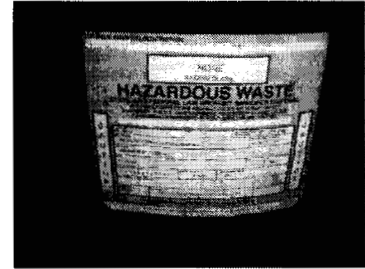
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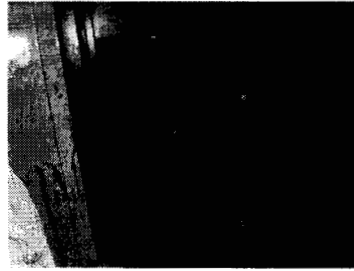
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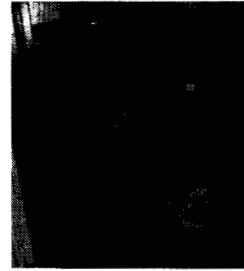
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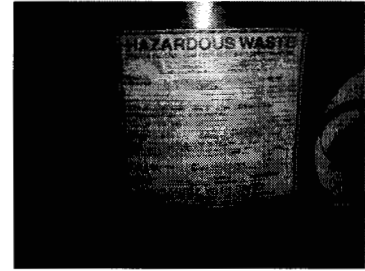
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12/9/2010



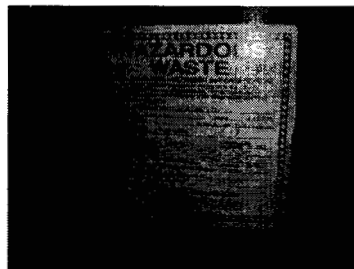
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PC090165.JPG
12/9/2010



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12/9/2010



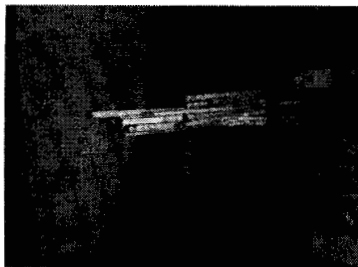
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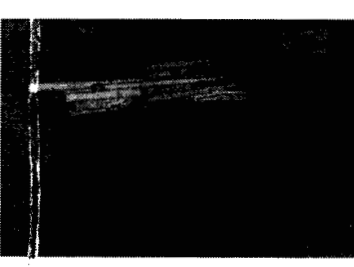
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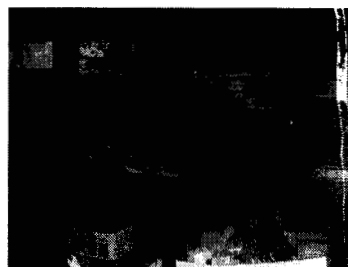
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PC090169.JPG
12/9/2010



PC090169a.JPG
12/9/2010



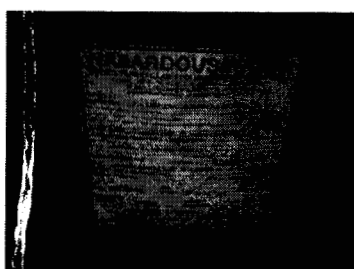
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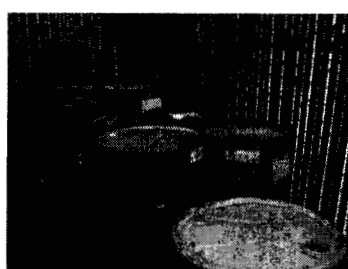
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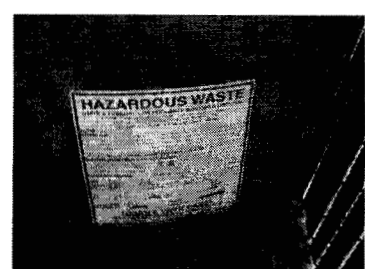
PC090171.JPG



PC090172.JPG



PC090173.JPG



PC090174.JPG



PC090175.JPG
12/9/2010



PC090176.JPG
12/9/2010

Photograph Log for EPA's December 9, 2010 Owens-Brockway Glass Container RCRA Inspection

All photographs on this log were taken with a digital camera by Amy C. Miller, RCRA Enforcement Office, EPA Region IX. Please note that each photograph number begins with "PC0901" and that the photograph log starts with photograph number 090.

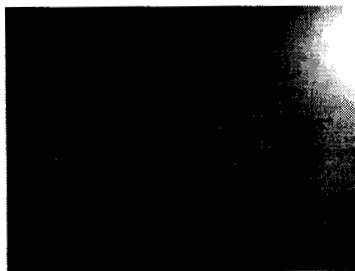
- 27. Error
- 28. Error
- 29. Outdoor Area: 500-gallon diesel tank
- 30. Outdoor Area: Hazardous waste label on the 3,950-gallon used oil tank. Note: Label is faded.
- 31. Outdoor Area: Overview of the 3,950-gallon used oil tank.
- 32. Outdoor Area: 3,950-gallon used oil tank marked as "used oil".
- 33. Outdoor Area: Hazardous waste label on roll-off bin of furnace/checker dust. Note: the label does not have an accumulation start date.
- 34. Outdoor Area: Overview of the roll-off bin of furnace/checker dust.
- 35. Outdoor Area: Hazardous waste label on roll-off bin of furnace/check dust is modified to have an accumulation start date.
- 36. Outdoor Area: Bin for EP dust re-used on-site.
- 37. Stairwell: Trash can with lint waste.
- 38. Stairwell: Trash can with lint waste.
- 39. Stairwell: Overview of the two trash cans
- 40. Basement Level: 2,025-gallon used oil tank. Photograph is blurred.
- 41. Basement Level: 2,025-gallon used oil tank with hazardous waste label and marked as "used oil".
- 42. Basement Level: Close up of hazardous waste label on 2,025-gallon used oil tank. Note: no accumulation start date.
- 43. Basement Level: 2,025-gallon used oil tank is open on top.

44. Near Furnace Area: spent blast grit bin.
45. Near Furnace Area: Hazardous waste label on spent blast grit.
46. Near Furnace Area: Used oil container. Facility representative stated it was not waste, but rather used on site. Image is blurred.
47. Near Furnace Area: Same as previous photograph.
48. Near Furnace Area: Close-up of the top of the container in the previous photograph.
49. Near Furnace Area: Close-up of the label on the container in photograph 47.
50. C-Tank Satellite Accumulation Area: Hazardous waste label on 55-gallon drum of used oil. Note: label was faded.
51. C-Tank Satellite Accumulation Area: Open bin of contaminated gloves.
52. C-Tank Satellite Accumulation Area: Hazardous waste label on the container in the previous photograph.
53. C-Tank Satellite Accumulation Area: Two open top 55-gallon drums of used oil adjacent to the bin of contaminated gloves.
54. C-Tank Satellite Accumulation Area: Same as previous photograph.
55. C-Tank Satellite Accumulation Area: Close up of the open top of the container in the previous photograph.
56. D and E Area: Open top can of contaminated gloves.
57. D and E Area: Contents of the can in the previous photograph.
58. D and E Area: Trash can.
59. D and E Area: Contaminated gloves inside trash can in previous photograph.
60. Selecting Maintenance Area: Overview of satellite accumulation area.
61. Selecting Maintenance Area: Hazardous waste label for used oil on one of the three containers in the previous photograph. Note: the label does not have an accumulation start date.
62. Selecting Maintenance Area: Hazardous waste label on one of the three containers in the photograph 60.

63. Selecting Maintenance Area: Hazardous waste label on one of the three containers in the photograph 60.
64. Selecting Maintenance Area: Inside the flammable cabinet are a 55-gallon drum of methyl ethyl ketone and several unlabeled containers of Methyl ethyl ketone.
65. Selecting Maintenance Area: Label of the 55-gallon drum of methyl ethyl ketone in previous photograph.
66. Selecting Maintenance Area: Inside the flammable cabinet are a 55-gallon drum of methyl ethyl ketone rags and rags stored on top of the container
67. Selecting Maintenance Area: Label of the 55-gallon drum of methyl ethyl ketone rags in previous photograph. Note: the accumulation start date states "12/5/2005".
68. Universal waste and CRT Storage Area: Overview of the area.
69. Universal waste and CRT Storage Area: Close-up of lamps stored without a container.
70. Universal waste and CRT Storage Area: Close-up of lamps stored without a container.
71. 90 Day Storage Area: Open used oil 55-gallon drum.
72. 90 Day Storage Area: Close-up of label in previous photograph. Note: there is no accumulation start date.
73. 90 Day Storage Area: All empty containers except for the blue bin in the back area.
74. 90 Day Storage Area: Hazardous waste label on one of the empty containers.
75. 90 Day Storage Area: Hazardous waste label on one of the empty containers.
76. 90 Day Storage Area: All empty containers beyond the blue bin in the foreground.



PC090127.JPG
12/9/2010



PC090128.JPG
12/9/2010



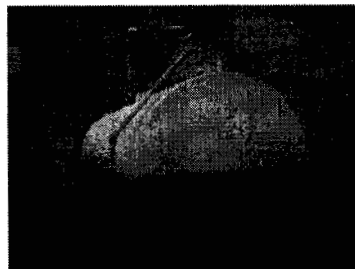
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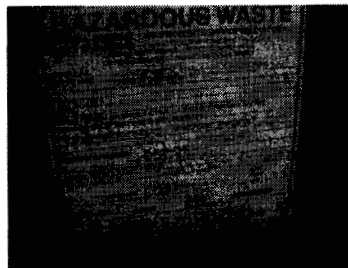
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12/9/2010



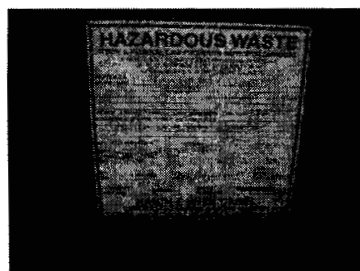
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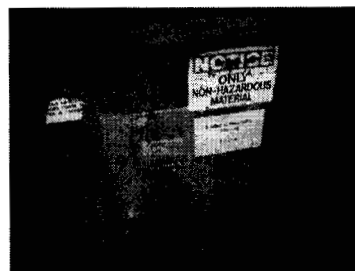
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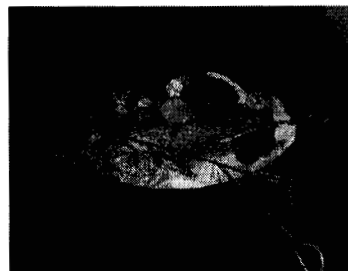
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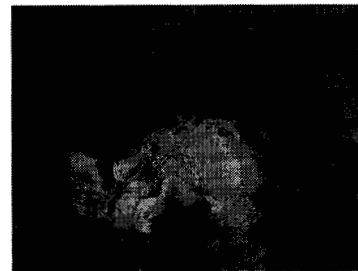
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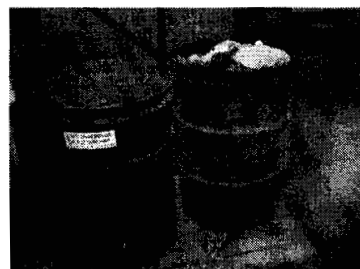
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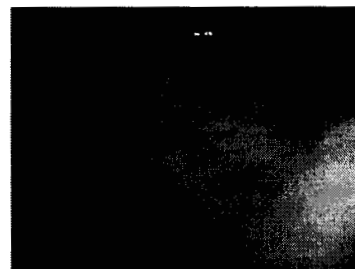
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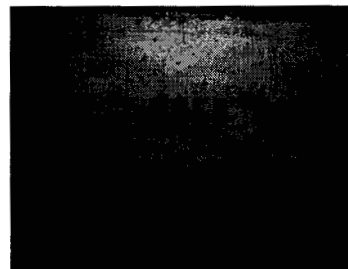
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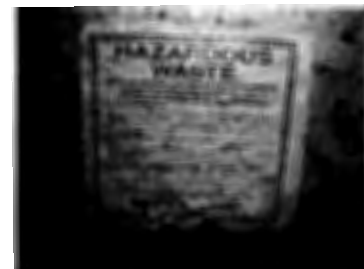
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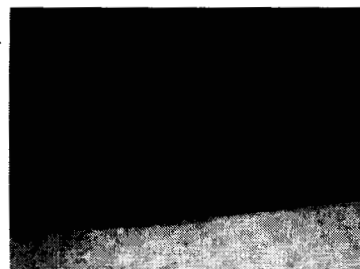
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PC090141.JPG
12/9/2010



12/9/2010



PC090143.JPG
12/9/2010



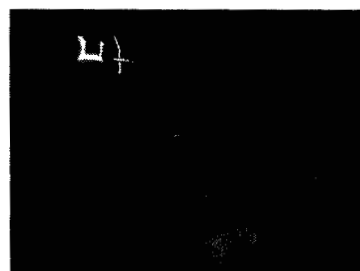
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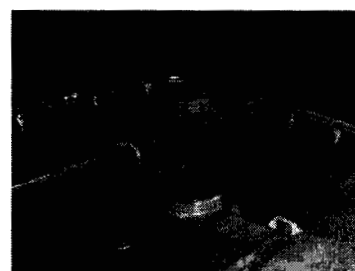
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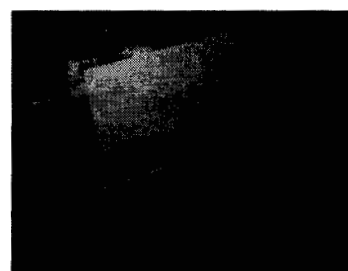
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PC090147.JPG



PC090148.JPG



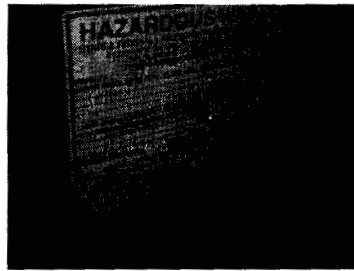
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PC090150.JPG



PC090151.JPG
12/9/2010



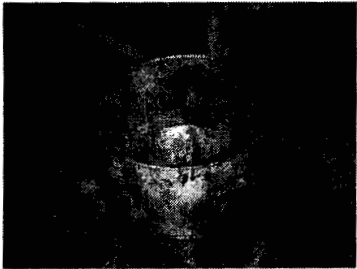
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12/9/2010



PC090154.JPG
12/9/2010



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12/9/2010



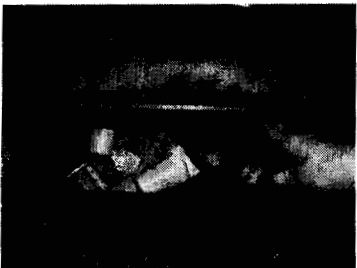
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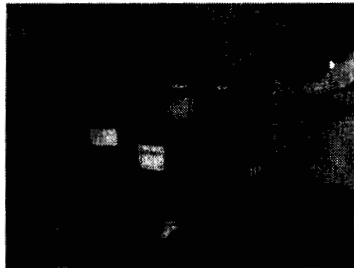
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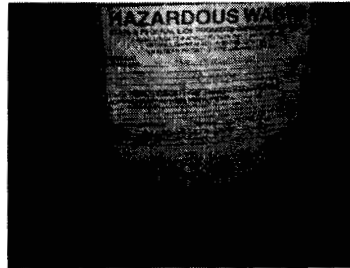
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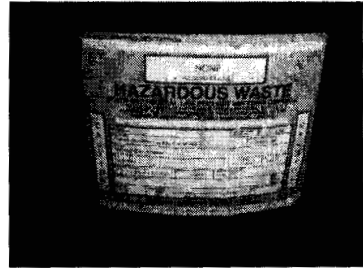
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PC090160.JPG
12/9/2010



PC090161.JPG
12/9/2010



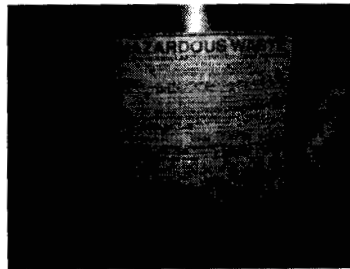
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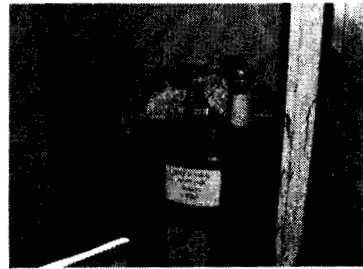
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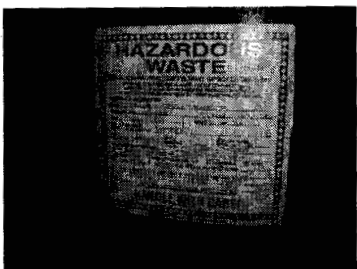
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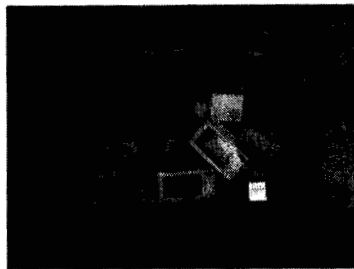
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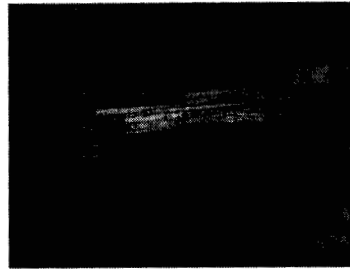
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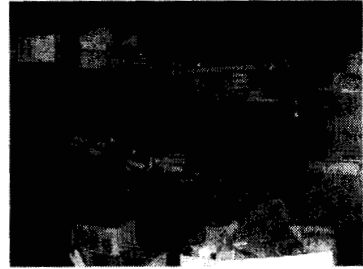
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12/9/2010



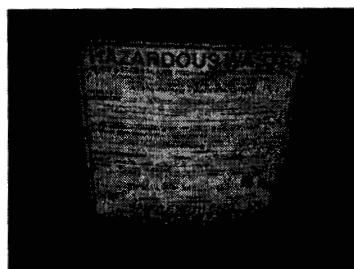
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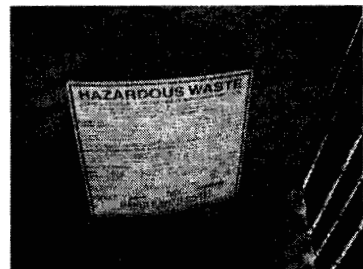
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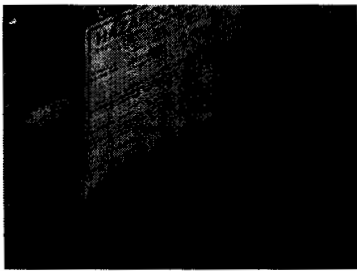
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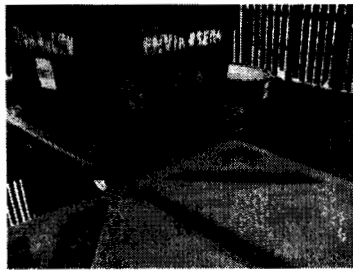
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PC090174.JPG



PC090175.JPG
12/9/2010



PC090176.JPG
12/9/2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

MAR 14 2011

CERTIFICATION OF VIOLATION CORRECTION

William Boscacci
Environmental, Health & Safety Director
Owens-Brockway Glass Container Inc.
3600 Alameda Ave.
Oakland, CA 94601
EPA Identification Number: CAT000618918

Dear Mr. Boscacci:

On December 9, 2010, a hazardous waste compliance inspection was conducted by a representative of the United States Environmental Protection Agency ("EPA") at Owens-Brockway Glass Container Inc., located in Oakland, CA, with EPA Identification Number CAT000618918. During the course of this investigation, information was gathered in accordance with Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), as amended {42 U.S.C. §6927}.

Pursuant to Section 3008 of RCRA {42 U.S.C. § 6928}, the EPA required you to correct the identified areas of noncompliance and to submit documentation of their correction to the EPA within 30 days from the date of your receipt of the Warning Letter sent by the EPA on January 25, 2011.

Your submittal, dated February 23, 2011, adequately addresses the violations which were noted during the inspection, and documents Owens-Brockway Glass Container Inc.'s return to compliance with the regulations cited in the inspection report. This letter should not be construed as a determination by the EPA of your compliance with any other applicable regulation.

Owens-Brockway Glass Container Inc. should continue to take the necessary steps to maintain and ensure compliance with all applicable Federal, State and local environmental requirements. If you have questions related to the inspection report or this letter, please contact Clint Seiter of my staff at (415) 972-3298 or seiter.clint@epa.gov.

Sincerely,

Amy C. Miller, Manager
RCRA Enforcement Office

cc: Charles McLaughlin, DTSC
Leroy Griffin, Oakland Fire Department

ROUTING SLIP FOR RCRA INSPECTION REPORTS

From: CLINT SEITER

Facility Name: OWENS-BROCKWAL GLASS

	Initials	Date
1. Lead Inspector (Report Writer):	CTS	1/12/11
- RCRA Info Evaluation & Violation Entry (CEI Date)	CTS	1/12/11
- ICIS Entry (Add Compliance Monitoring)	CTS	1/12/11
- RCRA Info Enforcement Entry (102, 105)	CTS	1/12/11
- EJ Maps ?		
2. 2nd Inspector (Reviewer): <u>Holloway</u>	Am	1/14/11
3. QA/QC Team Reviewer (Formal Actions Only):		
4. Supervisor:	ACM	1/18/11
5. Lou Tully: ?		
6. Lead Inspector (File):		

Notes:

- Factual Change.
- Photolog should only have original photos
Not cropped. Let's talk.

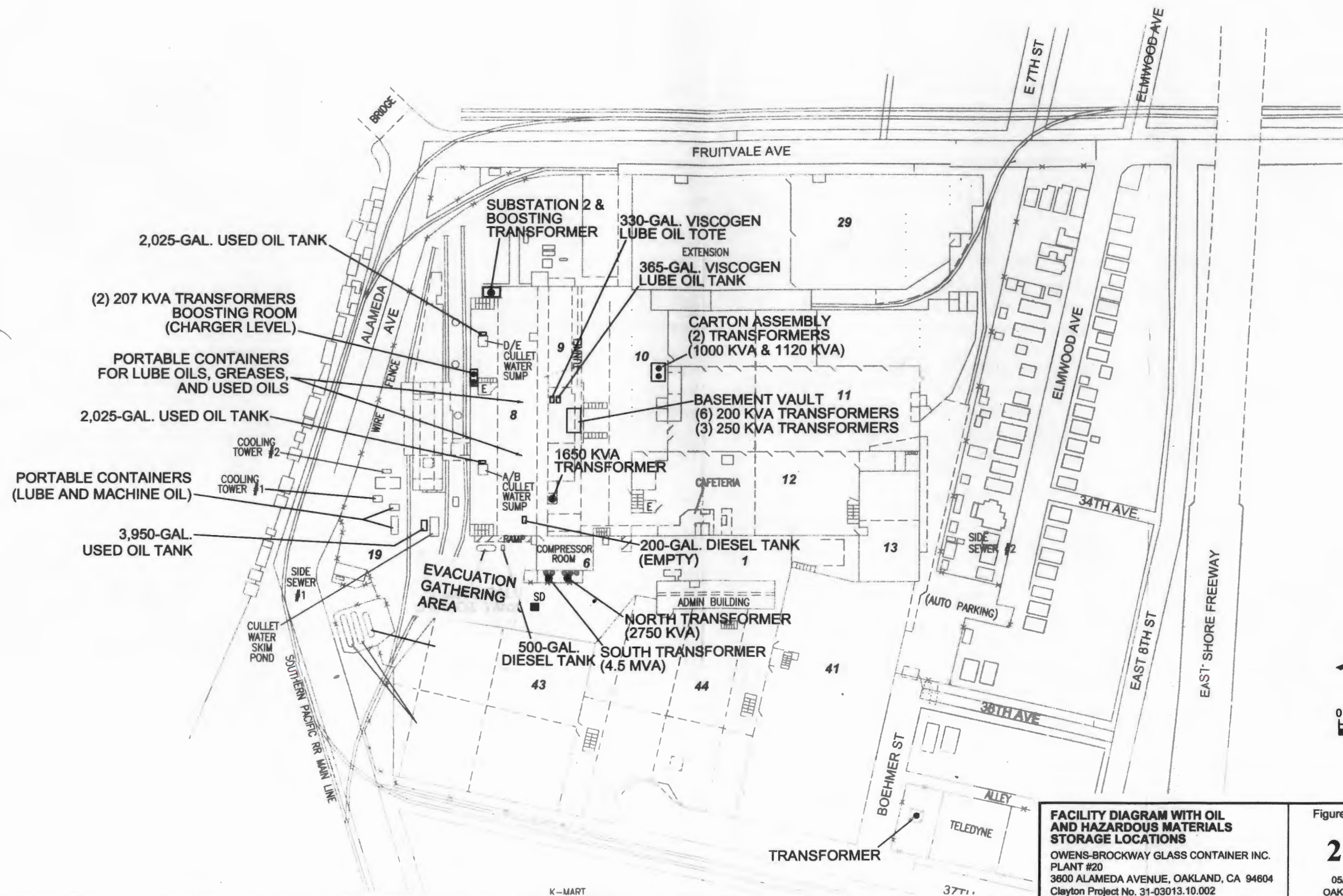
ROUTING SLIP FOR RCRA INSPECTION REPORTS

From: _____

Facility Name: _____

	Initials	Date
1. Lead Inspector (Report Writer):		
– RCRA Info Evaluation & Violation Entry (CEI Date)		
– ICIS Entry (Add Compliance Monitoring)		
– RCRA Info Enforcement Entry (102, 105)		
– EJ Maps		
2. 2nd Inspector (Reviewer):		
3. QA/QC Team Reviewer (Formal Actions Only):		
4. Supervisor:		
5. Lou Tully:		
6. Lead Inspector (File):		

Notes:



FACILITY DIAGRAM WITH OIL AND HAZARDOUS MATERIALS STORAGE LOCATIONS
 OWENS-BROCKWAY GLASS CONTAINER INC.
 PLANT #20
 3600 ALAMEDA AVENUE, OAKLAND, CA 94604
 Clayton Project No. 31-03013.10.002

Figure
2
 05/30/03
 OAKLAND



ACM 12/9/10

2009 Comprehensive Biennial Report

Report run on: January 3, 2011 - 5:03 PM

Version 5.0

User Selection Criteria

BR Cycle: 2009	Number of GM Forms: 25
Handler ID: CAT000618918	Number of WR Forms: 25
Included in National Report: Yes	GM and WR Form Sort Order: Descending Order by Waste Amount

Results:

Data meeting the criteria you selected follows.

Total Pages: 3

Report Description

This report is designed to provide all information from the Biennial Report forms in a concise manner. This report should be used after identifying facilities with potential problems using the Preliminary State Detail Analysis volume, the Preliminary TSD & LQG List volumes or the Top Generator/Manager/Shipper/Receiver List reports below. If the user is not interested in seeing GM or WR forms, 0 (zero) may be specified to omit this portion of the report. The user may restrict data to records that were actually included in the National Biennial RCRA Hazardous Waste Report.

Report Information

Name: b_comprehensive.rdf
Deployed: April 2003
Last Revised: June 2010
Contact: rcrainfo.help@epa.gov

2009 Comprehensive Biennial Report

Page 2

Report run on: January 3, 2011 - 5:03 PM

EPA ID: CAT000618918 **Handler Included in National Report:** Yes **Sequence Number:** 1 **Submittal Source:** Annual/Biennial Report updated with Notification

Site Name: OWENS BROCKWAY GLASS CONTAINERS

Activity Location: CALIFORNIA

Land Type: Private

Location Address: 3600 ALAMEDA AVENUE
OAKLAND, CA 94601

Mailing Address: 3600 ALAMEDA AVENUE
OAKLAND, CA 94601
UNITED STATES

County: ALAMEDA

Contact Person: BILL BOSCACCI
3600 ALAMEDA AVENUE
OAKLAND, CA 94601
UNITED STATES
Ph: (510) 436-2166, Fax: (510) 436-2032
BILL.BOSCACCI@O-I.COM

Certifying Person: PLANT MANAGER LOREN JOHNSON
Signed: 02/18/2010

Owner (current)
OWENS ILLINOIS
From: 01/01/1937

ONE O-I PLAZA
ONE MICHAEL OWENS WAY
PERRYSBURG, OH 43551
PERRYSBURG

Type: Private
Phone: (567) 336-8682

Notes:

F

Operator (current)
OWENS ILLINOIS
From: 01/01/1937
Notes:

Type: Private

F

Notes:

Regulated Waste Activities

Hazardous Waste Generator Status

Federal: LARGE QUANTITY GENERATOR

State: LARGE QUANTITY GENERATOR

Exempt Boiler and/or Industrial Furnace

Importer Activity:

Mixed Waste Generator:

Transporter Activity:

Tsd Activity:

Recycler Activity:

Other Hazardous Waste Generator Activities

Small Quantity Onsite Burner Exemption:

Smelting, Melting, Refining Furnace Exemption:

EPA Waste Codes: D001 D006 D007 D008 D010 D035 F005

State Waste Codes: 135 181 214

Universal Waste

No Universal Waste Information

NAICS Codes: 327213 - GLASS CONTAINER MANUFACTURING

State Activity: No State Activity Information

Used Oil Activities

Used Oil Transporter Activity

Transfer Facility:

Transporter:

Used Oil Processor and/or
Re-refiner Activity

Processor:

Refiner:

Underground Injection Control:

Off-Specification Used Oil Burner:

Used Oil Fuel Marketer Activity

Marketer who first claims the used oil
meets the specifications:

Marketer who directs shipment
off-specification used oil to off-specification
used oil burner:

Destination Facility for Universal Waste:

2009 Comprehensive Biennial Report

Page 3

Report run on: January 3, 2011 - 5:03 PM

EPA ID: CAT000618918 - OWENS BROCKWAY GLASS CONTAINERS (continued)

Form GM - Page: 1

ELECTROSTATIC PRECIPITATOR DUST

EPA Waste Codes: D006 D007 D008 D010

State Waste Codes: CA-181

Notes:

Source: HQ-G15-EQUIPMENT CHANGE

On-Site Process:

Form: HQ-W319-OTH INORGANIC SOLIDS

Waste Minimization: Recycling on-site was implemented

N
RCRA-radioactive Mixed: NO

Qty Generated (tons):	94.52	Qty Generated:	189,030.00	UOM:	HQ-POUNDS	Density:	0.00/	Generation Included in NBR:	Yes
Off-Site Shipments:	EPA ID	Sequence Number	Quantity (tons)	Quantity	Management Method	Shipment Included in NBR			
	NVT330010000	1	27.15	54,290.00	H132 - LANDFILL OR SURFACE IMPOUNDMENT	Yes			
	CAT000646117	2	67.37	134,740.00	H132 - LANDFILL OR SURFACE IMPOUNDMENT	Yes			

Form GM - Page: 2

ELECTROSTATIC PRECIPITATOR RINSATE

EPA Waste Codes: D007 D008

State Waste Codes: CA-135

Notes: CLEANING OF AIR POLLUTION CONTROL EQUIPMENT

Source: HQ-G13-CLEANING EQUIPMENT

On-Site Process:

Form: HQ-W504-OTHER SLUDGES

Waste Minimization: No waste minimization efforts were implemented

N
RCRA-radioactive Mixed: NO

Qty Generated (tons):	27.90	Qty Generated:	55,800.00	UOM:	HQ-POUNDS	Density:	0.00/	Generation Included in NBR:	Yes
Off-Site Shipments:	EPA ID	Sequence Number	Quantity (tons)	Quantity	Management Method	Shipment Included in NBR			
	CAD008488025	1	27.90	55,800.00	H121 - NEUTRALIZATION ONLY	Yes			

Form GM - Page: 3

IGNITABLE SPENT SOLVENT AND INK, MEK

EPA Waste Codes: D001 D035 F005

State Waste Codes: CA-214

Notes: CLEANING OF SPRAY HEADS

Source: HQ-G01-RINSING

On-Site Process:

Form: HQ-W209-PAINT, INK, ETC.

Waste Minimization: No waste minimization efforts were implemented

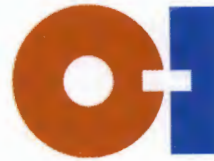
N
RCRA-radioactive Mixed: NO

Qty Generated (tons):	0.18	Qty Generated:	55.00	UOM:	HQ-GALLONS	Density:	6.70/ HQ-lbs/gal	Generation Included in NBR:	Yes
Off-Site Shipments:	EPA ID	Sequence Number	Quantity (tons)	Quantity	Management Method	Shipment Included in NBR			
	ARD981057870	1	0.18	55.00	H061 - FUEL BLENDING	Yes			

No Form WR Pages Submitted

* End of Report *





CAT 000 618918

Part A 3A-2

Bill Boscacci
Oakland, CA 94601
+1 510 436 2166 tel
+1 510 436 2032 fax
bill.boscacci@us.o-i.com

February 23, 2011

Clint Seiter
Mailcode: WST-3
RCRA Enforcement Office
U. S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Re: RCRA Compliance Evaluation Inspection of December 9, 2010

Dear :Mr. Seiter,

This letter will provide written and photographic documentation of compliance to the potential violations detailed in the warning letter received by Owens Brockway on January 25, 2011. The order which this documentation is layout here will follow that which you presented in your report starting on page 14, Potential RCRA Violations.

Hazardous Waste Storage Area Labeling Requirements

First issue, the faded hazardous waste label on the outdoor checker dust bin; this photo shows the label with the writing legible.

HAZARDOUS WASTE
STATE & FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY,
OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE
CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.

PROPER D.O.T.
SHIPPING NAME HAZARDOUS WASTE, SOLID, N.O.S., 9 NA3077, PGIII
(CADMIUM, CHROMIUM)

☒ SOLID ☐ LIQUID ☐ FLAMMABLE ☐ TOXIC ☐ CORROSIVE ☐ REACTIVITY ☒ OTHER
HAZARDOUS DESCRIPTION/PHYSICAL STATE/PROPERTIES:
07-013-3287-0; FURNACE / CHECKER DUST :: US ECOLOGY

GENERATOR INFORMATION: TELEPHONE (510) 436-2166
NAME OWENS ILLINOIS INC PLANT 20 - OAKLAND
ADDRESS 3800 ALAMEDA AVENUE
CITY OAKLAND STATE CA ZIP 94601

EPA ID # CAT000618918 E.P.A. WASTE # D008 D007 D010 STATE WASTE CODE 181

ACCUMULATION START DATE 12/3/10 MANIFEST TRACKING NO. _____

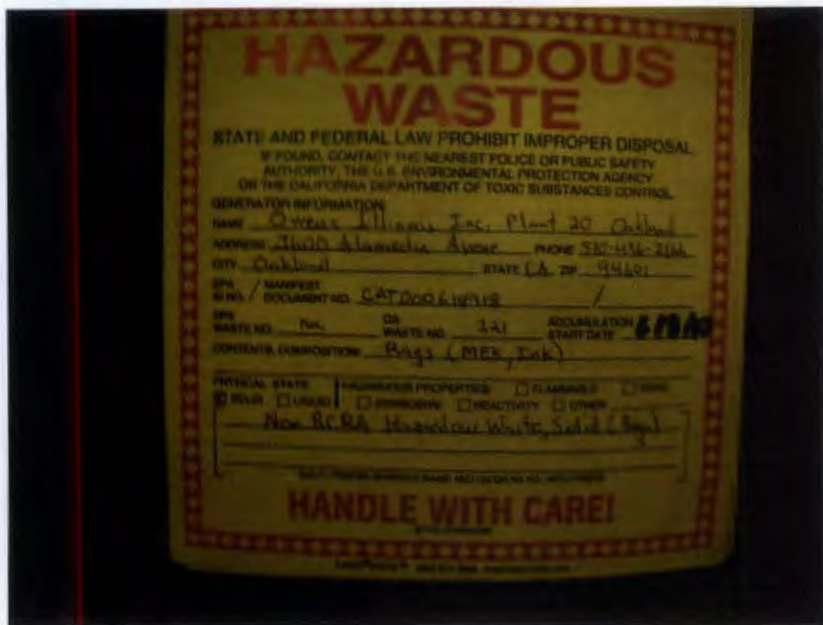
HANDLE WITH CARE!

Satellite Accumulation Area Labeling Requirements

Next issue, the one quart container of spent MEK in Selecting Maintenance, the photo shows the container labeled. It is a container used to transfer the spent ink and solvent to the satellite accumulation drum.



Also, a 55 gallon drum of discarded MEK contaminated rags had an incorrect date. This next photo shows the correction.



Used Oil Labeling

This next photo will serve as photographic evidence of the resolution of this issue. The specific drum mentioned has been shipped off-site and a copy of the manifest is attached to this letter. However, as you can see in the "Hazardous Description" field of the label the words "Used Oil" are printed. We have had all new labels for oil printed and the old labels removed and destroyed. All of the hazardous waste labels for oil now state this.

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY,
OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE
CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.

PROPER D.O.T. SHIPPING NAME NON RCRA HAZARDOUS WASTE E. LIQUID (OIL)

☐ SOLID ☐ LIQUID ☐ FLAMMABLE ☐ TOXIC ☐ CORROSIVE ☐ REACTIVITY ☐ OTHER

HAZARDOUS DESCRIPTION/PHYSICAL STATE/PROPERTIES:
3281831 IM, USED OIL, DEMENNO KERDOON

GENERATOR INFORMATION: TELEPHONE (510) 436-2168

NAME OWENS ILLINOIS INC PLANT 20 - OAKLAND

ADDRESS 3800 ALAMEDA AVENUE

CITY OAKLAND STATE CA ZIP 94601

EPA ID: CAT000618918 E.P.A. WASTE #: NON STATE WASTE CODE: 221

CONTINUATION 11/18/10 MANIFEST

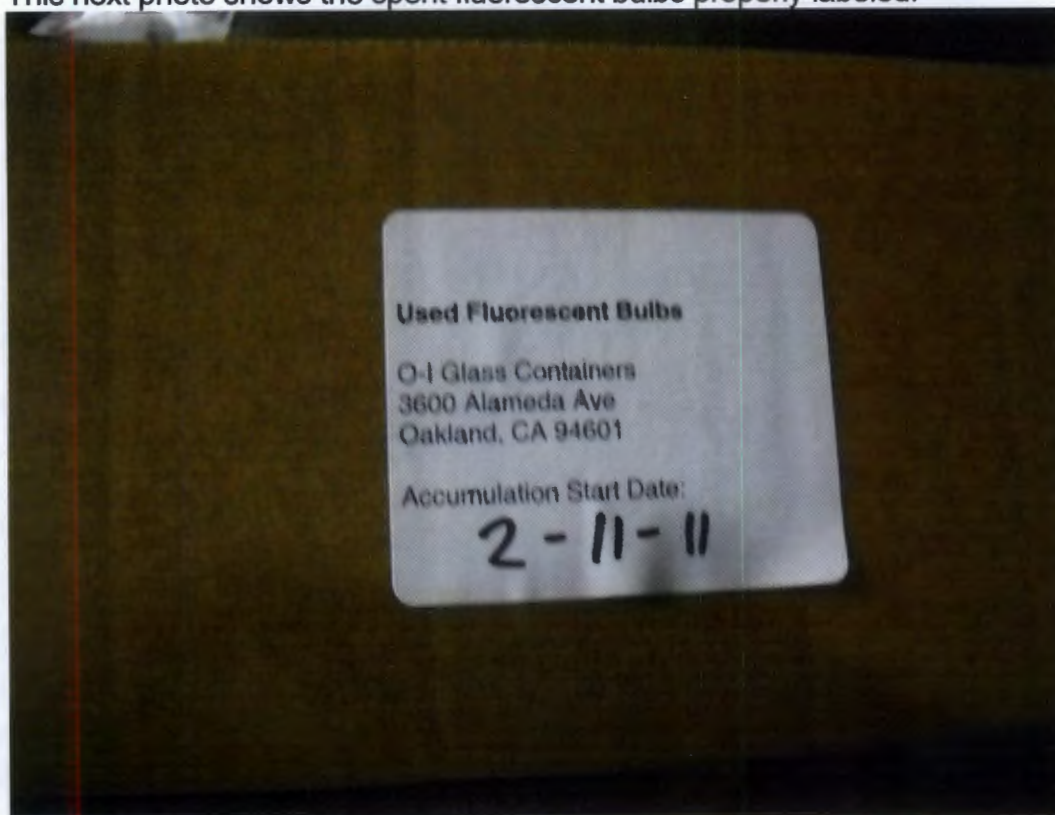
Universal Waste – Containers

This next photo shows the spent fluorescent bulbs properly containerized.



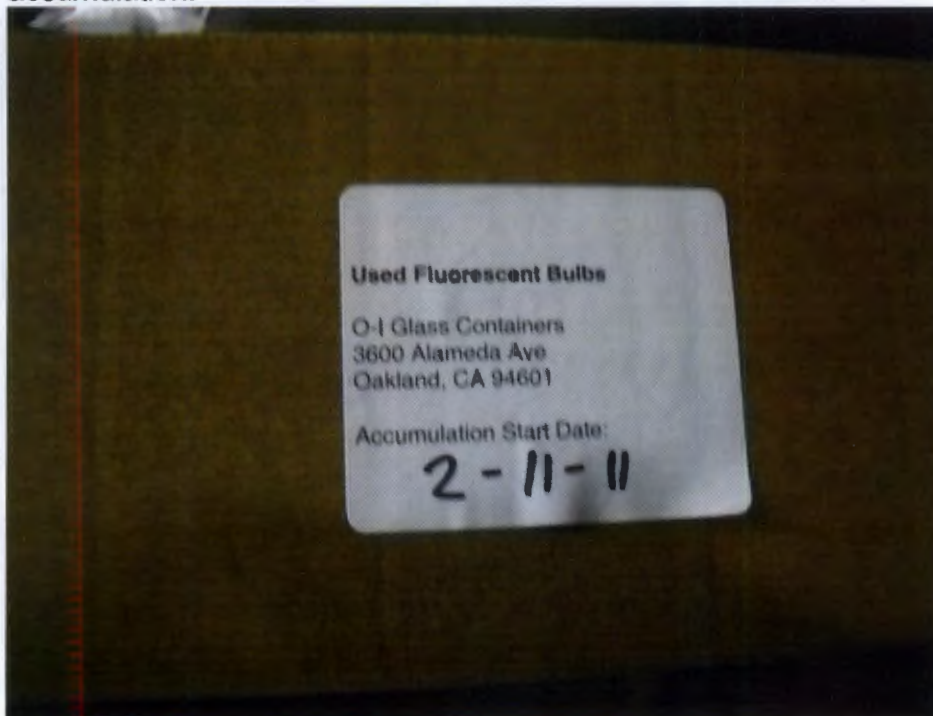
Universal Waste – Labeling

This next photo shows the spent fluorescent bulbs properly labeled.



Universal Waste – Accumulation Start Date

This next photo shows the spent fluorescent bulbs properly labeled with a start date of accumulation.



Training: Job Title and Description

The appendix of this letter contains the list of names of the hazardous waste handlers, job description of the hazardous waste manager and the documentation of the required training for the handling and disposing of oily debris/rags/gloves.

Hazardous Waste Storage Area Labeling Requirements

This next photo shows label on the exterior used oil tank as being legible.

HAZARDOUS WASTE
STATE & FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY,
OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE
CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.

PROPER D.O.T. SHIPPING NAME: NON RCRA HAZARDOUS WASTE, LIQUID (OIL)

☐ SOLID ☒ LIQUID ☒ FLAMMABLE ☒ TOXIC ☒ CORROSIVE ☐ REACTIVITY ☐ OTHER

HAZARDOUS DESCRIPTION/PHYSICAL STATE/PROPERTIES:
3281631 IM, USED OIL, DEMENNO KERDOON

GENERATOR INFORMATION: TELEPHONE: (510) 436-2100
NAME: OWENS ILLINOIS INC PLANT 20 - OAKLAND
ADDRESS: 3800 ALAMEDA AVENUE
CITY: OAKLAND STATE: CA ZIP: 94612

EPA ID #: CAT000618618 E.P.A. WASTE #: NON STATE WASTE CODE:

ACCUMULATION START DATE: 11/18/10 MANIFEST TRACKING NO.

This photo shows the label of the used oil tank in the basement of C furnace area being legible.

HAZARDOUS WASTE
STATE & FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY,
OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE
CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.

PROPER D.O.T. SHIPPING NAME: NON RCRA HAZARDOUS WASTE, LIQUID (OIL)

☐ SOLID ☒ LIQUID ☒ FLAMMABLE ☒ TOXIC ☒ CORROSIVE ☐ REACTIVITY ☐ OTHER

HAZARDOUS DESCRIPTION/PHYSICAL STATE/PROPERTIES:
3281631 IM, USED OIL, DEMENNO KERDOON

GENERATOR INFORMATION: TELEPHONE: (510) 436-2100
NAME: OWENS ILLINOIS INC PLANT 20 - OAKLAND
ADDRESS: 3800 ALAMEDA AVENUE
CITY: OAKLAND STATE: CA ZIP: 94612

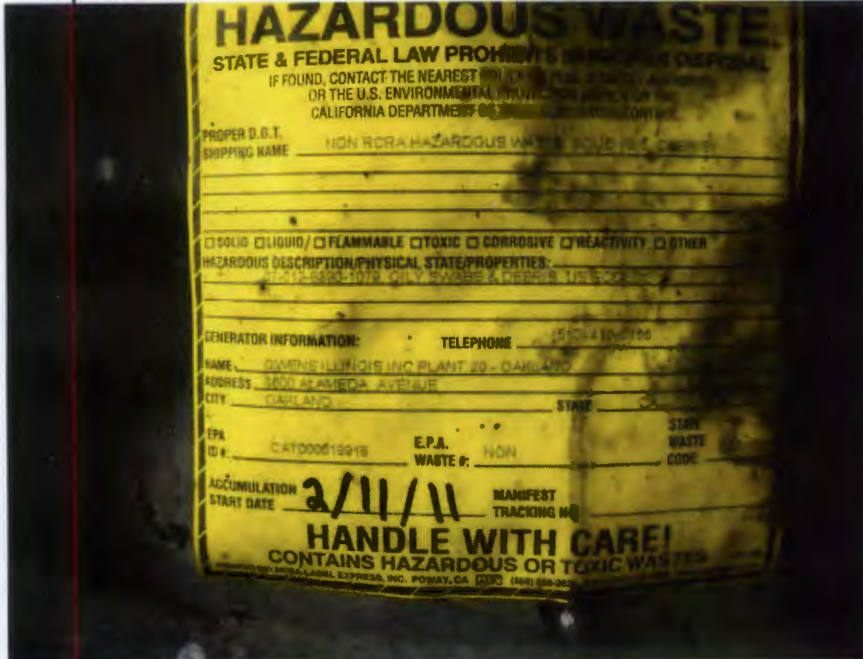
EPA ID #: CAT000618618 E.P.A. WASTE #: NON STATE WASTE CODE:

ACCUMULATION START DATE: 11/18/10 MANIFEST TRACKING NO.

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES

Satellite Accumulation Area Labeling Requirements

This photo is of a C Furnace Area drum labeled.



This photo shows the Selecting Maintenance Area drums labeled.



Open Containers

These photos show the waste drums in the C furnace area with the lid and bung closed



Lack of Aisle Space

This photo shows proper access to the drums is maintained.



Failure to make a hazardous waste determination

A hazardous waste determination of the oil/grease contaminated rags and personal protective equipment (PPE) has been made and it has been determined to be "NON-RCRA Hazardous Waste, Solid (Oil, Debris)". The laboratory analysis is attached in the appendix. The established Standard Operating Procedure for disposing this waste is attached in the appendix

Tanks: Certification

The appendix of this letter contains a copy of the certification of the structural integrity of the facility's three used oil tanks.

Tanks: Leak Detection System

The Leak Detection System of our 3950 gallon used oil tank is the daily inspection by our personnel.

Tanks: Daily Inspection

The appendix of this letter contains a copy of the daily inspection report that is completed during the monitoring of the facility's three used oil tanks.

If you have any questions about this response contact Bill Boscacci at 510-436-2166 or bill.boscacci@o-i.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Bost", with a long horizontal flourish extending to the right.

Tom Bost
O-I Oakland Plant Manager

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAT000618918	2. Page 1 of 1	3. Emergency Response Phone (800) 368-4778	4. Manifest Tracking Number 008051516 JJK		
5. Generator's Name and Mailing Address OWENS ILLINOIS INC PLANT 20 - OAKLAND 3600 ALAMEDA AVENUE OAKLAND CA 94601				Generator's Site Address (if different than mailing address) 3600 ALAMEDA AVENUE OAKLAND CA 94601			
6. Transporter 1 Company Name ENVIRONMENTAL RECOVERY SERVICES, INC.				U.S. EPA ID Number CAR000188201			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address DEMENNO KERDOON 2000 NORTH ALAMEDA STREET COMPTON CA 90222				U.S. EPA ID Number CAT090013352			
Facility's Phone: (310) 537-7100							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
			No.	Type			
		1. NON RCRA HAZARDOUS WASTE, LIQUID (OIL)		DM	110	G	221
		2.					
		3.					
	4.						
14. Special Handling Instructions and Additional Information ERG# 251 171** ERB W OM 70499 - KA ** BILL TO ENVIROSERV ** WEAR PROPER PPE							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name W/L [Signature]				Signature [Signature]		Month Day Year 12/2/11	
INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
	Transporter signature (for exports only): _____						
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name [Signature]				Signature [Signature]		Month Day Year 12/2/11
	Transporter 2 Printed/Typed Name				Signature		Month Day Year
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number _____						
	Facility's Phone: _____						
	18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____						
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
	1.	2.	3.	4.			
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
	Printed/Typed Name				Signature		Month Day Year

CAF 0.0 5-29-17
P. - L 3A-2

Job Description

Job Title: Environmental, Health, & Safety Director

Job Summary:

Responsible for implementation, maintenance, and oversight of the plant's Environmental Management System (EMS) to ensure plant compliance with Federal, State, and Local laws. Serves as plant liaison and official representative in maintaining a positive working relationship with EH&S agencies. Interacts with outside consultants, contractors, and regulatory agencies to ensure that the plant complies with applicable regulations.

Job Duties:

- > Interacts with Environmental Health & Safety Regulatory agencies (EH&S) and serves as plant's spokesperson with inspectors, explaining and providing information regarding plant's efforts to comply with required regulations.
- > Interacts with EH&S consultants in the performance of EH&S consulting activities at the facility to ensure there is adequate exchange of information in maintaining plant's environmental standards to minimize business risk.
- > Prepares internal and external EH&S documents and reports as required. Maintains required records and documentation.
- > Serves as plant's official representative at Hearings and Board meetings conducted by the regulatory agencies.
- > Conducts internal inspections and audits to maintain EH&S compliance on an ongoing basis.
- > Collects EH&S samples and submits them to an authorized testing laboratory for analysis. Reviews and interprets results of analysis and advises appropriate action to take if risk areas exist.
- > Maintains required EH&S reference materials. Keeps abreast of changing regulations. (Federal, State, and Local)
- > Develops outlines and conducts internal training of employees in appropriate EH&S areas.
- > Verifies and prepares EH&S shipping documents and manifests in accordance with regulatory requirements.

Education/Experience:

Education: Bachelor's degree in Engineering or in Environmental Studies

Experience: Plant experience working with environmental issues and/or technical knowledge of environmental regulations.

Maintenance

Pay Date

01/27/2011

Union Dues Taken

Location

020

Ded	Description	Local	Name	Amount	Ssn	Clock #
N1	N1-LOCAL UN DUESR	1142	Battu,Michael D			
	N1-LOCAL UN DUESR		Burns,Michael S			
	N1-LOCAL UN DUESR		Carero,Edward			
	N1-LOCAL UN DUESR		Carino,Enrique R			
	N1-LOCAL UN DUESR		Chew,Henry F			
	N1-LOCAL UN DUESR		Clark,Donald A			
	N1-LOCAL UN DUESR		Cobb,Philip R			
	N1-LOCAL UN DUESR		Flentroy,Michael J			
	N1-LOCAL UN DUESR		Fong,Roland Y			
	N1-LOCAL UN DUESR		Gonzalez,Manuel V			
	N1-LOCAL UN DUESR		Gutierrez,Jesus A			
	N1-LOCAL UN DUESR		Hord,Philip K			
	N1-LOCAL UN DUESR		Lheureux,Michel			
	N1-LOCAL UN DUESR		Loomer,Joseph M			
	N1-LOCAL UN DUESR		Nietogomez,Michael A			
	N1-LOCAL UN DUESR		Nunez,Adolfo R			
	N1-LOCAL UN DUESR		Powell,Douglas J			
	N1-LOCAL UN DUESR		Rull,Henry V			
	N1-LOCAL UN DUESR		Sanford,Degail Y			
	N1-LOCAL UN DUESR		Smith,Clyde S			
	N1-LOCAL UN DUESR		Strayer,David N			
	N1-LOCAL UN DUESR		Torres,Raymond R			
	N1-LOCAL UN DUESR		Washington,Kirk D			
	N1-LOCAL UN DUESR		Zhou,Richard K			
		1142	Sum:			
N1			Sum:	175.34		
		Count All:	24		Count All:	24

Forming Operators

Pay Date

01/27/2011

Union Dues Taken

Location

020

	Description	Local	Name	Amount	Ssn	Clock #
N1	N1-LOCAL UN DUESR	2002	Adkins,Harold D			
	N1-LOCAL UN DUESR		Agbonavbare,Stephen G			
	N1-LOCAL UN DUESR		Alvarado,Rogelio			
	N1-LOCAL UN DUESR		Arroyo,Salvador M			
	N1-LOCAL UN DUESR		Baldosano,Jose P			
	N1-LOCAL UN DUESR		Bettencourt,Lawrence J			
	N1-LOCAL UN DUESR		Betts,Cole R			
	N1-LOCAL UN DUESR		Burciaga,Julio A			
	N1-LOCAL UN DUESR		Burciaga,Servando			
	N1-LOCAL UN DUESR		Busier,Gilman R			
	N1-LOCAL UN DUESR		Cambra,Ricky A			
	N1-LOCAL UN DUESR		Carretero,Sergio			
	N1-LOCAL UN DUESR		Castro,Joel R			
	N1-LOCAL UN DUESR		Clement,Gregory			
	N1-LOCAL UN DUESR		Daliva,Roquelito V			
	N1-LOCAL UN DUESR		Davis,Charles E			
	N1-LOCAL UN DUESR		Duckett,Andre C			
	N1-LOCAL UN DUESR		Garrison,Kenneth J			
	N1-LOCAL UN DUESR		Hernandez Sr,Steve P			
	N1-LOCAL UN DUESR		Hill,Gregory O			
	N1-LOCAL UN DUESR		Hunwick,Brian A			
	N1-LOCAL UN DUESR		Johnson,Lawrence M			
	N1-LOCAL UN DUESR		Jones,Geronimo E			
	N1-LOCAL UN DUESR		Jones,Robert			
	N1-LOCAL UN DUESR		Lascano,Anthony			
	N1-LOCAL UN DUESR		Liles,Samuel L			
	N1-LOCAL UN DUESR		Miller,Gary T			
	N1-LOCAL UN DUESR		Moa Jr,Vaiolini			
	N1-LOCAL UN DUESR		Moa,Sosia			
	N1-LOCAL UN DUESR		Mojica,Renato A			
	N1-LOCAL UN DUESR		Monarrez,Francisco			
	N1-LOCAL UN DUESR		Nevels,Walter L			
	N1-LOCAL UN DUESR		Nunu,David			
	N1-LOCAL UN DUESR		Osborne,Nathel			
	N1-LOCAL UN DUESR		Quintero,Carlos H			
	N1-LOCAL UN DUESR		Reid,Daniel J			
	N1-LOCAL UN DUESR		Roberts,Joseph			
	N1-LOCAL UN DUESR		Roe,Thomas M			
	N1-LOCAL UN DUESR		Rojas,Mauro			
	N1-LOCAL UN DUESR		Ruth,James A			

	N1-LOCAL UN DUESR		Smith,Burl G
	N1-LOCAL UN DUESR		Smith,Stephen
	N1-LOCAL UN DUESR		Snow,Ronald
	N1-LOCAL UN DUESR		Stewart,Jackie L
	N1-LOCAL UN DUESR		Torres,Refugio G
	N1-LOCAL UN DUESR		Valencia,Alejandro
	N1-LOCAL UN DUESR		Valencia,Carlos
	N1-LOCAL UN DUESR		Viveiros,Jose A
	N1-LOCAL UN DUESR		Waldron,Jim D
	N1-LOCAL UN DUESR		Williams,David K
	N1-LOCAL UN DUESR		Young,Nicholas A
		2002	Sum:
N1			Sum:
		Count All:	51

Proper handling and disposal of Oily Gloves and Rags

We must not throw away oily debris, rags and gloves in the trash.



This is wrong. It is against the law.

Oily debris, rags and gloves must be disposed of in the drums labeled with a Hazardous Waste label.



These hazardous waste drums must be kept closed when not in use.

We can recycle and reuse the oily gloves. They will be washed by a laundry service and returned to us.



The dirty gloves will be put into the containers labeled “Dirty Gloves”.

From there they will be picked up by a laundry service, washed and returned to us for reuse.

Once the gloves are worn out they will be disposed of in the drums labeled with a Hazardous Waste label.



Place the worn out oily gloves in the drum and close lid.

Oily swabs will be disposed of in the drums labeled with a Hazardous Waste label.



We will cut the metal handle off the swabs and place the metal in the scrap metal container for recycling.

The hazardous waste drum for oily swab heads is to be closed by sliding the gate plate shut.



Name	Clock #
Newman C	2053
Wendy Turner	977
Joyce Cagle	4496
CHARLES Davis	0349
Janice Loomer	—
Margarita Pabalaca	4253
Tessie Pingol	4249
MINH TRUONG	3259
ROMULO CANCINO	4248
Ramon Ortega	4272
Socorro Armenta	3104
Emilia Mier	0350
Meleane Pulu	4290
Virginia Conconles	2490
Gloria Amaya	2796
CONRADO Aniciete	3024
ALEXANDER BUTH	2339
John N. Thompson	2857
JOMAR DAVID	4351
REY VILAY	4344
SAMUEL CRANE	3366
RAYMOND TORRES	2236
MARIA NAVARRO	0345
Ann Davis	4008
Barbara LOVE	3698
Ruby Lupo	2719
Earnestine McJannet	4880

A - SHIFT Meeting Sign In Sheet 2/23/11

Name

Clock #

AUNG THU

4384

Ines Castaneda 0386

WARLITO MINA

4261

ROMEO RIVERA

0213

DIANNE SMITH

0211

CONNIE BAUGHER

0262

Richard Zhou

2795

my 121M 0632

Joe Sibay

3097

Robert Arce

5143

Adela Mejia

515

Linda Anicete

232

Estela Felipe

2402

Manuel A. Alvarez

5046

Ramon Hernandez

7001

Manuel M. Alvarez

3873

A. Ortiz

5131

Lolita Cachola - 4270

Pedro Alvarez - 7010

Edith Simpson

3645

Manu Min

193

Manu A. Horston

3365

Meeting

Sign-in

Conrad Helms

Roland Fong

De Carino

HENRY V. ROLL

Douglas Powell

Emar Williams

DEGAIL SANFORD

2/22/11 3PM

Name	Clock #
ELOY ORTEGA	7008
ALBERTO ESPARZA	5156
MICHAEL ZOBB	5036
RICK STORY	4554
OZELL WHITWORTH	
VICTOR RAMIREZ	7000

2.22.11

10AM

LEONARDO CAWIT	
RENATO A. MONICA	388
PAUL KRYZILO	411
Mauro Rojas	451
SAM HOLMES	2070
ROCKY MAUPIN	0796
MARIO LANGARICA	0162
Stephen Agbonawbare	4238
Ralph Dargatzis	1678
Man Rm	312

Maintenance

2-16-11
9:30 am

Michael Flentrog	2756
Don Clark	507
Michael S. Burns	673
Michael F. Gomez	3790
A. Javier Chavez	4398
Joe Loomer	1253
MIKE BATTU	3736
St	
Donny J. Lerner	202
Phyllis Cobb	1857



NAME

CLOCK #

Rocky R. Tindin
Donut Conner

3149

2262

A Shift Not End

2.24.11 10AM

Name	Clock #
RONALD SNOW	367
Jim Ruth	533
Bob A. Betts	418
G. A. H. / E	3355
Rich CAMPBELL	17
Samuel S. Liles	4025

CLT 000 62 27
R. L. 31

**ATMOSPHERIC STORAGE TANK
INTERNAL / EXTERNAL & ULTRASONIC
OUT-OF-SERVICE INSPECTION REPORT**

OWENS-BROCKWAY
A-SUMP (USED OIL BIN)
OAKLAND FACILITY
OAKLAND, CA
DECEMBER 7, 2004



Prepared by:

HMT Inspection
A Division of HMT Inc.
250 W. Channel Rd., Suite D
Benicia, CA 94510
707.747.0444

INTRODUCTION

Owens-Brockway contracted with HMT Inspection, a division of HMT Inc. to provide inspection services for the A-Sump (Used Oil Bin). The tank is located at the Oakland facility in Oakland, CA.

This report documents the findings of the examinations performed on December 7, 2004 and provides an evaluation of the inspection results per the applicable criteria of API Standard 653.

Matthew K. Orr
API 653 Aboveground Storage Tank Inspector
Certification Number: 6158
Level II Technician

Mike Domralski
Technician

SUITABILITY FOR SERVICE

A-Sump (Used Oil Bin) is suitable for service according to the applicable criteria of API Standard 653 if the following conditions are met:

1. The repair recommendations in Section 2.0 Summary and Repair Recommendations of this report have been implemented.

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**API 653 Out-of-Service Inspection Report
for
Owens-Brockway
A-Sump (Used Oil Bin)
Oakland, CA**



HMT Inspection
December 7, 2004
Page 5 of 21

1.0 DESCRIPTION

GENERAL:

TANK NUMBER:	A-Sump (Used Oil Bins)
OWNER:	Owens-Brockway
DESIGN STANDARD:	No Data Available
TANK LOCATION:	Oakland, CA
MANUFACTURER:	No Data Available
PRODUCT:	Used Oil
CATHODIC PROTECTION:	No
DATA PLATE PRESENT:	No
DOT REGULATED TANK:	No

DIMENSIONS:

DIAMETER:	10'L x 6'W x 41-46" H
-----------	-----------------------

GEOMETRY:

FOUNDATION:	Concrete Floor
BOTTOM:	Box Shaped Fillet Welded Construction
FIXED ROOF:	Grating Used As Cover

DATES:

YEAR BUILT:	No Data Available
LAST COATED:	No Data Available
LAST INSPECTION:	No Data Available

COATINGS:

BOTTOM:	None
SHELL:	Silver Paint

**API 653 Out-of-Service Inspection Report
for
Owens-Brockway
A-Sump (Used Oil Bin)
Oakland, CA**



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2.0 SUMMARY AND REPAIR RECOMMENDATIONS

The following is a summary of the significant findings of the inspection.

FOUNDATION: Due to drainage issues during winter months, heavy presence of water/mud/debris collects around base of this tank since it is located in the basement level of this building. Detection of a possible leak from this tank would be difficult. (*Reference Repair Recommendation 1*).

Tank was constructed on staggered angle iron skids of varying heights to match sloped bottom detail. At this time the skids appear to be in acceptable condition where visible.

The tank does not appear to be anchored to the concrete foundation. It should be noted that standing water around the tank limited confirmation of an anchorage system. (*Reference Repair Recommendation 2*)

BOTTOM: The tank was in service and no bottom inspection was performed. One (1) thickness reading taken to verify bottom thickness (0.250 inch).

SHELL: Visual (VT) inspection of the external shell found that the coating system is weathered with random failures present (*Reference Repair Recommendation 3*).

Tank has two (2) 6-inch stiffening angles which are stitch welded around the shell. These stiffening angles appear to be in acceptable condition based on a limited visual evaluation due to cleanliness issues.

NOZZLES AND APPURTENANCES: A Visual (VT) inspection of the nozzles found that the coating system is weathered with random failures present (*Reference Repair Recommendation 4*).

All valves should be serviced during the next scheduled out of service period.

The tank currently does not have a high-level alarm (*Reference Repair Recommendation 5*).

FIXED ROOF: The tank utilizes a steel grating system to cover the top of the tank. The coating system of the steel grating has failed. (*Reference Repair Recommendation 6*).

ADDITIONAL COMMENTS: The next external API 653 inspection should be conducted within 5 years and no later than December 2009 (Ref. API 653, Para. 6.3.2.1).

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for
Owens-Brockway
A-Sump (Used Oil Bin)
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REPAIR RECOMMENDATIONS

The following is a summary of the repair recommendations.

- 1) Consideration should be given to removing the debris around the tank and to monitoring the ground to determine if the tank bottom is possibly leaking. In addition, consideration should be given to installing a barrier around the tank to keep flooding issues to a minimum so that a proper visual inspection can be performed at all times

Comments:

- 2) Consideration should be given to installing an anchorage system to account for possible seismic overturning loads .

Comments:

- 3) Consideration should be given to cleaning and recoating the tank shell at this time.

Comments:

- 4) Consideration should be given to cleaning and recoating the shell nozzle details at this time.

Comments:

- 5) Consideration should be given to installing a high-level alarm system or alternative overfill protection device at the next out-of-service interval.

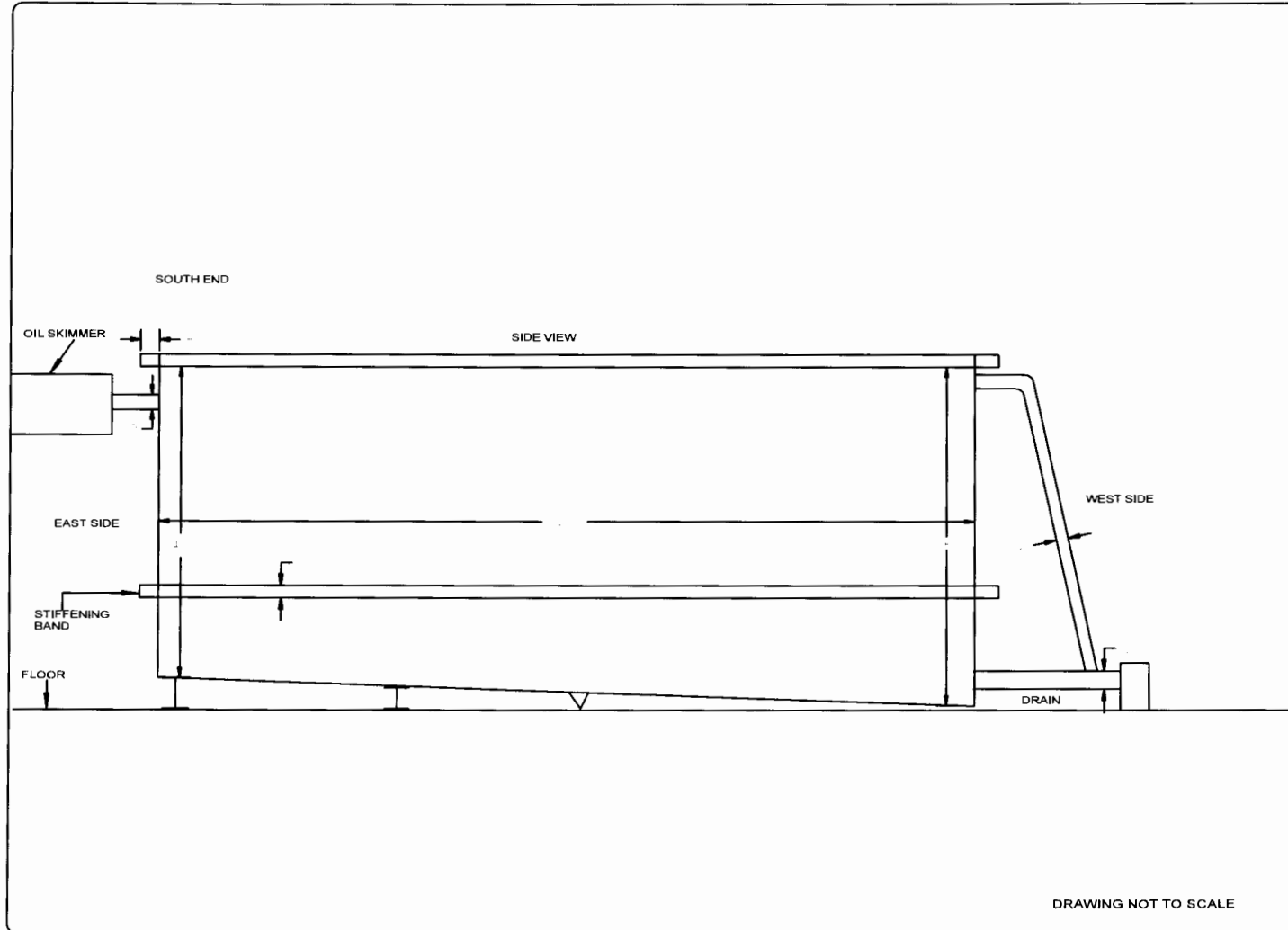
Comments:

- 6) Consideration should be given to cleaning and recoating the steel grating cover detail at this time.

Comments:

3.0 DRAWINGS
3.1 A-SUMP LAYOUT

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DRAWING NOT TO SCALE

SHELL COATING : SILVER PAINT

PROGRAM NAME : AUTO CAD LT.
LAYER NOZZLES = NOZZLES
LAYER INDICATIONS = INDICATIONS

- △ HOLE
- TOP SIDE INDICATION
- SOIL SIDE INDICATION
- ⊗ TOP SIDE / SOIL SIDE INDICATION
- ⊠ TOP SIDE/ SOIL SIDE / HOLE INDICATION
- └ REFERENCE CORNER

LEGEND

INSPECTION 250 W. CHANNEL RD., SUITE D BENICIA, CA. 94510	
TITLE USED OIL BIN LAYOUT	
CUSTOMER OWENS - BROCKWAY	
DRAWN BY R.B.K.	DATE 12-7-04

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for
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Oakland, CA**



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4.0 INSPECTION REPORT

4.1 FOUNDATION

4.1.1 FOUNDATION INSPECTION CHECKLIST

✓	#	DESCRIPTION	COMMENTS
Y	1	Inspect foundation for damage.	Reference Section 2.0
Y	2	Search for indications of bottom leakage.	Reference Section 2.0
N	3	Inspect for cavities and vegetation under foundation.	N/A
Y	4	Check for proper water runoff and drainage away from the tank.	Reference Section 2.0
Y	5	Check for grade or other material covering the shell-to-bottom junction. Detail findings.	Acceptable
N	6	Check for settlement around the perimeter of the tank.	N/A
N	7	Check for presence or condition of moisture barrier.	N/A
Y	8	Check for anchorage. Record sizes, spacing between anchors and condition.	Reference Section 2.0

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4.2 SHELL

4.2.1 SHELL INSPECTION CHECKLIST

✓	#	DESCRIPTION	COMMENTS
Y	1	Inspect external shell for coating failure, corrosion or leaks.	Reference Section 2.0
Y	2	Inspect external shell-to-bottom weld area for corrosion, defects, or thinning on weld, shell, or bottom.	Acceptable
N	3	Inspect internal shell surface for corrosion or leaks.	N/A
Y	4	Inspect weld seams for corrosion or defects. Visually inspect rivet joint details and record findings.	Fillet welded Acceptable
N	5	Inspect wind girder for corrosion or damage.	Tank has stiffening system/ 6" angle Acceptable
Y	6	Check support welds to shell for corrosion or defects.	Acceptable
N	7	Note whether supports have reinforcing pads welded to shell.	N/A
N	8	Conduct Visual Inspection of shell insulation. Inspect for damage.	N/A
N	9	Visually inspect shell for out-of-roundness.	N/A: Box shaped tank
N	10	Shell mounted vents, Check for debris covering or condition of screens.	N/A

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4.3 NOZZLES AND APPURTENANCES

4.3.1 NOZZLE AND APPURTENANCE INSPECTION CHECKLIST

✓	#	DESCRIPTION	COMMENTS
Y	1	Inspect for signs of corrosion or other defects around all manways, nozzles, and attachments.	Reference Section 2.0
N	2	Inspect for flange leaks and leaks around bolts.	N/A
Y	3	Check piping and valves for leaks, thermal relief, or signs of damage.	Acceptable
N	4	Inspect condition of stairway ladder and platform	N/A
N	5	Check welds on shell mounted davit clips above large valves or equipment.	N/A
N	6	Describe and verify operability of gauging devices, if applicable.	N/A
N	7	Inspect mixer for support, leakage, and defects.	N/A
N	8	Check for adequate reinforcement around nozzles and appurtenances.	N/A
N	9	Verify adequate weld spacing around nozzles and appurtenances.	N/A
N	10	Check floating suction for damage and proper support. Check condition of shell mounted angle limiting brackets or angle limiting chains mounted to bottom	N/A

4.3.2 NOZZLE AND APPURTENANCE TABLE

Item	Description	Pipe Size (in.)	Station (ft.)	CL Elev. (in.)	Reinforcing Plate				Neck Thick (in.)	Fling Thick (in.)	Cover Thick (in.)	Tell- tale	Weld Space (in.)	Comments
					Width (in.)	Height (in.)	Thick (in.)	Shape						
A	Nozzle (East side)	3.0	-	-	-	-	-	-	0.187	-	-	-	-	To oil skimmer
B	Nozzle (West side)	3.0	-	-	-	-	-	-	0.176	-	-	-	-	
C	Nozzle	4	-	-	-	-	-	-	0.196	-	-	-	-	Bottom drain
The stations are measured circumferentially counterclockwise from Manway A.														

Shape



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5.0 NDE INSPECTION

5.1 NDE INSPECTION SCOPE

The following Nondestructive Examinations (NDE) were conducted to evaluate the physical characteristics of the tank:

- A) Visual Inspection (VT) of areas for the detection of anomalies or significant internal metal loss which may affect the integrity. Performed in accordance with HMT Inspection VT Procedure No. 1611.4, Revision No. 1.
- B) Random UT readings on shell plates. Performed in accordance with HMT Inspection UT Procedure No. 1611.1, Revision No. 3.
- C) Random UT readings on shell nozzles. Performed in accordance with HMT Inspection UT Procedure No. 1611.1, Revision No. 3.

5.2 BOTTOM EXAMINATION

The external shell-to-bottom weld was examined utilizing VT inspection methods. There were no recordable indications.

5.3 SHELL READINGS

The tank shell plate UT data was collected utilizing random readings. Ten (10) readings were taken on the north and south sides and five (5) readings were taken on the east and west sides (Ref. Table A).

5.4 NOZZLE READINGS

The tank shell nozzle UT data was collected utilizing random readings. One (1) reading per nozzle was taken (Ref. Sections 4.4.2).

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6.0 EQUIPMENT

6.1 ULTRASONIC

The UT equipment utilized for the inspection was a Krautkramer USN-52R Flaw Detector.

The transducer utilized was a KBA Model FH2E-WR, 7.5 MHz, 0.375 inch dual element and a Xactex CM-HR, 5.0 MHz, 0.250 inch single element.

The calibration block utilized was a 5 step, 4340 steel test block.

Echogel 20 was used as a couplant.

6.2 PIT GAUGE

The pit gauge utilized was a W.R. Thorpe Co. standard pipe pit gauge.

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7.0 TABLES

**TABLE A
SHELL READINGS
(in inches)**

READING	SOUTH	WEST	NORTH	EAST
1	0.243	0.247	0.246	0.247
2	0.246	0.246	0.244	0.249
3	0.244	0.247	0.246	0.248
4	0.246	0.247	0.243	0.248
5	0.246	0.247	0.242	0.248
6	0.244	-	0.249	-
7	0.248	-	0.249	-
8	0.244	-	0.245	-
9	0.246	-	0.244	-
10	0.244	-	0.244	-

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8.0 WARRANTY

WARRANTY

HMT Inspection, a division of HMT Inc. has evaluated the condition of this tank based on the observations and measurements made by the HMT Inspection tank Inspector. While our evaluation accurately describes the condition of the tank at the time of inspection, the tank owner/operator must independently assess the inspection information/report provided by HMT Inspection and any conclusions reached by the tank owner/operator and any action taken or omitted to be taken are the sole responsibility of the owner/operator. With respect to inspection and testing, HMT Inspection warrants only that the services have been performed in accordance with accepted industry practice. If any such services fail to meet the foregoing warranty, HMT Inspection shall re-perform the service to the same extent and on the same conditions as the original service.

The preceding paragraph sets forth the exclusive remedy for claims based on failure or of defect in materials or services, whether such claim is made in contract or tort (including negligence) and however instituted, and, upon expiration of the warranty period, all such liability shall terminate. The foregoing warranty is exclusive and in lieu of all other warranties, whether written, oral, implied or statutory. NO IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR PURPOSE SHALL APPLY, nor shall HMT Inspection be liable for any loss or damage whatsoever by reason of its failure to discover, report, repair or modify latent defects or defects inherent in the design of any tank inspected. In no event, whether a result of breach of contract, warranty or tort (including negligence) shall HMT Inspection be liable for any consequential or incidental damages including, but not limited to, loss of profit or revenues, loss of use of equipment tested or services by HMT Inspection or any associated damage to facilities, down-time costs or claims of other damages.

9.0 PHOTOGRAPHS

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Used Oil A Sump



Used Oil A Sump



Used Oil A Sump



Used Oil A Sump

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Skid Details



Foundation & Skid Detail



Standing Water Under Sump



View Under Sump Tank

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Grating On Sump Tank



Grating On Sump Tank



Stiffening Angle Detail



Coating Condition

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Top Angle Detail



Product Piping



Product Piping



Drain Piping

9.0 PHOTOGRAPHS

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Oil Skimmer Detail

01-201 512912
H-1 34-2

**ATMOSPHERIC STORAGE TANK
INTERNAL / EXTERNAL & ULTRASONIC
OUT-OF-SERVICE INSPECTION REPORT**

OWENS-BROCKWAY
D-SUMP (USED OIL BIN)
OAKLAND FACILITY
OAKLAND, CA
DECEMBER 7, 2004



Prepared by:

HMT Inspection
A Division of HMT Inc.
250 W. Channel Rd., Suite D
Benicia, CA 94510
707.747.0444

INTRODUCTION

Owens-Brockway contracted with HMT Inspection, a division of HMT Inc. to provide inspection services for the D-Sump (Used Oil Bin). The tank is located at the Oakland facility in Oakland, CA.

This report documents the findings of the examinations performed on December 7, 2004 and provides an evaluation of the inspection results per the applicable criteria of API Standard 653.

Matthew K. Orr
API 653 Aboveground Storage Tank Inspector
Certification Number: 6158
Level II Technician

Mike Domralski
Technician

SUITABILITY FOR SERVICE

D-Sump (Used Oil Bin) is suitable for service according to the applicable criteria of API Standard 653 if the following conditions are met:

1. The repair recommendations in Section 2.0 Summary and Repair Recommendations of this report have been implemented.

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for
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1.0 DESCRIPTION

GENERAL:

TANK NUMBER:	D-Sump (Used Oil Bin)
OWNER:	Owens-Brockway
DESIGN STANDARD:	No Data Available
TANK LOCATION:	Oakland, CA
MANUFACTURER:	No Data Available
PRODUCT:	Used Oil
CATHODIC PROTECTION:	No
DATA PLATE PRESENT:	No
DOT REGULATED TANK:	No

DIMENSIONS:

DIAMETER:	10'L x 6'W x 41-46" H
-----------	-----------------------

GEOMETRY:

FOUNDATION:	Concrete Floor
BOTTOM:	Box Shaped Fillet Welded Construction
FIXED ROOF:	Grating Used As Cover

DATES:

YEAR BUILT:	No Data Available
LAST COATED:	No Data Available
LAST INSPECTION:	No Data Available

COATINGS:

BOTTOM:	None
SHELL:	Silver Paint

**API 653 Out-of-Service Inspection Report
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D-Sump (Used Oil Bin)
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2.0 SUMMARY AND REPAIR RECOMMENDATIONS

The following is a summary of the significant findings of the inspection.

FOUNDATION: Due to drainage issues during winter months, heavy presence of water/mud/debris collects around base of this tank since it is located in the basement level of this building. Detection of a possible leak from this tank would be difficult. (*Reference Repair Recommendation 1*).

Tank was constructed on staggered angle iron skids of varying heights to match sloped bottom detail. At this time the skids appear to be in acceptable condition where visible.

The tank does not appear to be anchored to the concrete foundation. It should be noted that standing water around the tank limited confirmation of an anchorage system. (*Reference Repair Recommendation 2*)

BOTTOM: The tank was in service and no bottom inspection was performed. One (1) thickness reading taken to verify bottom thickness (0.250 inch).

SHELL: Visual (VT) inspection of the external shell found that the coating system is weathered with random failures present (*Reference Repair Recommendation 3*).

Tank has two (2) 6-inch stiffening angles which are stitch welded around the shell. These stiffening angles appear to be in acceptable condition based on a limited visual evaluation due to cleanliness issues.

NOZZLES AND APPURTENANCES: A Visual (VT) inspection of the nozzles found that the coating system is weathered with random failures present (*Reference Repair Recommendation 4*).

All three (3) shell nozzles have threaded connections (*Reference Repair Recommendation 5*).

All valves should be serviced during the next scheduled out of service period.

The tank currently does not have a high-level alarm (*Reference Repair Recommendation 6*).

**API 653 Out-of-Service Inspection Report
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SUMMARY OF SIGNIFICANT FINDINGS (Continued)

FIXED ROOF: The tank utilizes a steel grating system to cover the top of the tank. The coating system of the steel grating has failed. (*Reference Repair Recommendation 7*).

ADDITIONAL COMMENTS: The next external API 653 inspection should be conducted within 5 years and no later than December 2009 (Ref. API 653, Para. 6.3.2.1).

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D-Sump (Used Oil Bin)
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REPAIR RECOMMENDATIONS

The following is a summary of the repair recommendations.

- 1) Consideration should be given to removing the debris around the tank and to monitoring the ground to determine if the tank bottom is possibly leaking. In addition, consideration should be given to installing a barrier around the tank to keep flooding issues to a minimum so that a proper visual inspection can be performed at all times

Comments:

- 2) Consideration should be given to installing an anchorage system to account for possible seismic overturning loads .

Comments:

- 3) Consideration should be given to cleaning and recoating the tank shell at this time.

Comments:

- 4) Consideration should be given to cleaning and recoating the shell nozzle details at this time.

Comments:

- 5) Consideration should be given to replacing these nozzles with new API flanged nozzle details the next time the tank is taken out of service.

Comments:

- 6) Consideration should be given to installing a high-level alarm system or alternative overfill protection device at the next out-of-service interval.

Comments:

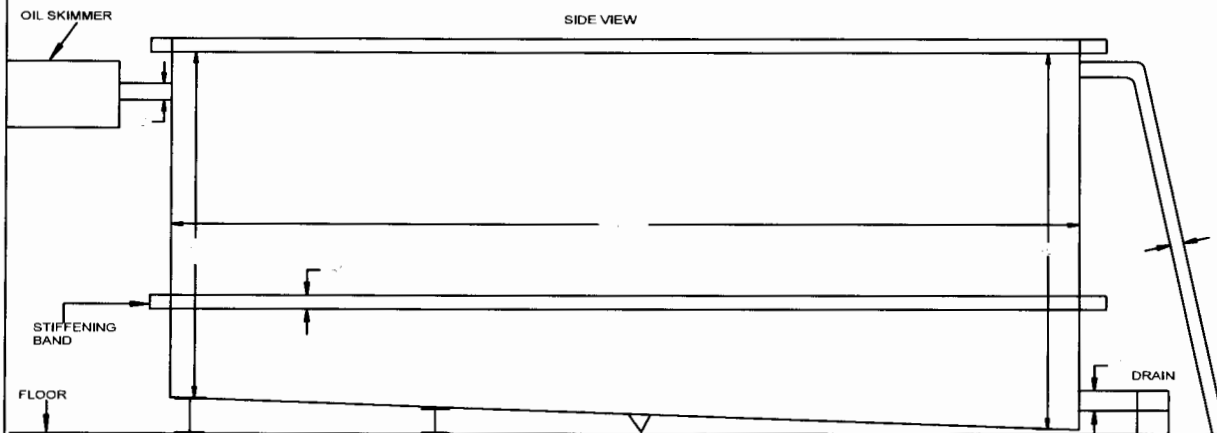
- 7) Consideration should be given to cleaning and recoating the steel grating cover detail at this time.

Comments:

3.0 DRAWINGS

3.1 D-SUMP LAYOUT







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DRAWING NOT TO SCALE

SHELL COATING : SILVER PAINT

PROGRAM NAME : AUTO CAD LT.
LAYER NOZZLES = NOZZLES
LAYER INDICATIONS = INDICATIONS

- | | |
|---|---------------------------------------|
|  | HOLE |
|  | TOP SIDE INDICATION |
|  | SOIL SIDE INDICATION |
|  | TOP SIDE / SOIL SIDE INDICATION |
|  | TOP SIDE/ SOIL SIDE / HOLE INDICATION |
|  | REFERENCE CORNER |

LEGEND

INSPECTION
250 W. CHANNEL RD. SUITE D
BENICIA, CA. 94510

TITLE: USED OIL BIN LAYOUT

CUSTOMER:
OWENS - BROCKWAY

TANK NO: NORTH END D - SUMP	JOB NO: 60780
-----------------------------------	------------------

U - 30MIF DRAWN BY R.B.K.	DATE 12-7-04
--	------------------------

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4.0 INSPECTION REPORT

4.1 FOUNDATION

4.1.1 FOUNDATION INSPECTION CHECKLIST

✓	#	DESCRIPTION	COMMENTS
Y	1	Inspect foundation for damage.	Reference Section 2.0
Y	2	Search for indications of bottom leakage.	Reference Section 2.0
N	3	Inspect for cavities and vegetation under foundation.	N/A
Y	4	Check for proper water runoff and drainage away from the tank.	Reference Section 2.0
Y	5	Check for grade or other material covering the shell-to-bottom junction. Detail findings.	Acceptable
N	6	Check for settlement around the perimeter of the tank.	N/A
N	7	Check for presence or condition of moisture barrier.	N/A
Y	8	Check for anchorage. Record sizes, spacing between anchors and condition.	Reference Section 2.0

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4.2 SHELL

4.2.1 SHELL INSPECTION CHECKLIST

✓	#	DESCRIPTION	COMMENTS
Y	1	Inspect external shell for coating failure, corrosion or leaks.	Reference Section 2.0
Y	2	Inspect external shell-to-bottom weld area for corrosion, defects, or thinning on weld, shell, or bottom.	Acceptable
N	3	Inspect internal shell surface for corrosion or leaks.	N/A
Y	4	Inspect weld seams for corrosion or defects. Visually inspect rivet joint details and record findings.	Fillet welded Acceptable
N	5	Inspect wind girder for corrosion or damage.	Tank has stiffening system/ 6" angle Acceptable
Y	6	Check support welds to shell for corrosion or defects.	Acceptable
N	7	Note whether supports have reinforcing pads welded to shell.	N/A
N	8	Conduct Visual Inspection of shell insulation. Inspect for damage.	N/A
N	9	Visually inspect shell for out-of-roundness.	N/A: Box shaped tank
N	10	Shell mounted vents, Check for debris covering or condition of screens.	N/A

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4.3 NOZZLES AND APPURTENANCES

4.3.1 NOZZLE AND APPURTENANCE INSPECTION CHECKLIST

✓	#	DESCRIPTION	COMMENTS
Y	1	Inspect for signs of corrosion or other defects around all manways, nozzles, and attachments.	Reference Section 2.0
N	2	Inspect for flange leaks and leaks around bolts.	N/A
Y	3	Check piping and valves for leaks, thermal relief, or signs of damage.	Acceptable
N	4	Inspect condition of stairway ladder and platform	N/A
N	5	Check welds on shell mounted davit clips above large valves or equipment.	N/A
N	6	Describe and verify operability of gauging devices, if applicable.	N/A
N	7	Inspect mixer for support, leakage, and defects.	N/A
N	8	Check for adequate reinforcement around nozzles and appurtenances.	N/A
N	9	Verify adequate weld spacing around nozzles and appurtenances.	N/A
N	10	Check floating suction for damage and proper support. Check condition of shell mounted angle limiting brackets or angle limiting chains mounted to bottom	N/A

4.3.2 NOZZLE AND APPURTENANCE TABLE

Item	Description	Pipe Size (in.)	Station (ft.)	CL Elev. (in.)	Reinforcing Plate				Neck Thick (in.)	Fling Thick (in.)	Cover Thick (in.)	Tell- tale	Weld Space (in.)	Comments
					Width (in.)	Height (in.)	Thick (in.)	Shape						
A	Nozzle (East side)	3.0	-	-	-	-	-	-	0.202	-	-	-	-	To oil skimmer
B	Nozzle (West side)	3.0	-	-	-	-	-	-	0.194	-	-	-	-	
C	Nozzle	3.0	-	-	-	-	-	-	0.177	-	-	-	-	Bottom drain
The stations are measured circumferentially counterclockwise from Manway A.														

Shape



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5.0 NDE INSPECTION

5.1 NDE INSPECTION SCOPE

The following Nondestructive Examinations (NDE) were conducted to evaluate the physical characteristics of the tank:

- A) Visual Inspection (VT) of areas for the detection of anomalies or significant internal metal loss which may affect the integrity. Performed in accordance with HMT Inspection VT Procedure No. 1611.4, Revision No. 1.
- B) Random UT readings on shell plates. Performed in accordance with HMT Inspection UT Procedure No. 1611.1, Revision No. 3.
- C) Random UT readings on shell nozzles. Performed in accordance with HMT Inspection UT Procedure No. 1611.1, Revision No. 3.

5.2 BOTTOM EXAMINATION

The external shell-to-bottom weld was examined utilizing VT inspection methods. There were no recordable indications.

5.3 SHELL READINGS

The tank shell plate UT data was collected utilizing random readings. Ten (10) readings were taken on the north and south sides and five (5) readings were taken on the east and west sides (Ref. Table A).

5.4 NOZZLE READINGS

The tank shell nozzle UT data was collected utilizing random readings. One (1) reading per nozzle was taken (Ref. Sections 4.4.2).

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6.0 EQUIPMENT

6.1 ULTRASONIC

The UT equipment utilized for the inspection was a Krautkramer USN-52R Flaw Detector.

The transducer utilized was a KBA Model FH2E-WR, 7.5 MHz, 0.375 inch dual element and a Xactex CM-HR, 5.0 MHz, 0.250 inch single element.

The calibration block utilized was a 5 step, 4340 steel test block.

Echogel 20 was used as a couplant.

6.2 PIT GAUGE

The pit gauge utilized was a W.R. Thorpe Co. standard pipe pit gauge.

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7.0 TABLES

**TABLE A
SHELL READINGS
(in inches)**

READING	SOUTH	WEST	NORTH	EAST
1	0.244	0.246	0.248	0.248
2	0.240	0.246	0.248	0.246
3	0.243	0.241	0.245	0.246
4	0.245	0.240	0.249	0.245
5	0.245	0.240	0.246	0.245
6	0.246	-	0.246	-
7	0.247	-	0.244	-
8	0.247	-	0.244	-
9	0.241	-	0.244	-
10	0.244	-	0.247	-

**API 653 Out-of-Service Inspection Report
for
Owens-Brockway
D-Sump (Used Oil Bin)
Oakland, CA**



HMT Inspection
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8.0 WARRANTY

WARRANTY

HMT Inspection, a division of HMT Inc. has evaluated the condition of this tank based on the observations and measurements made by the HMT Inspection tank Inspector. While our evaluation accurately describes the condition of the tank at the time of inspection, the tank owner/operator must independently assess the inspection information/report provided by HMT Inspection and any conclusions reached by the tank owner/operator and any action taken or omitted to be taken are the sole responsibility of the owner/operator. With respect to inspection and testing, HMT Inspection warrants only that the services have been performed in accordance with accepted industry practice. If any such services fail to meet the foregoing warranty, HMT Inspection shall re-perform the service to the same extent and on the same conditions as the original service.

The preceding paragraph sets forth the exclusive remedy for claims based on failure or of defect in materials or services, whether such claim is made in contract or tort (including negligence) and however instituted, and, upon expiration of the warranty period, all such liability shall terminate. The foregoing warranty is exclusive and in lieu of all other warranties, whether written, oral, implied or statutory. **NO IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR PURPOSE SHALL APPLY**, nor shall HMT Inspection be liable for any loss or damage whatsoever by reason of its failure to discover, report, repair or modify latent defects or defects inherent in the design of any tank inspected. In no event, whether a result of breach of contract, warranty or tort (including negligence) shall HMT Inspection be liable for any consequential or incidental damages including, but not limited to, loss of profit or revenues, loss of use of equipment tested or services by HMT Inspection or any associated damage to facilities, down-time costs or claims of other damages.

9.0 PHOTOGRAPHS

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Used Oil D Sump



Used Oil D Sump



Used Oil D Sump



Used Oil D Sump

9.0 PHOTOGRAPHS

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Skid Details



Skid Detail w/ Standing Water



Top View of Grating



Top View of Grating

9.0 PHOTOGRAPHS

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Top View of Grating



Stiffening Angle Around Sump



Top Angle Around Sump



Product Piping

9.0 PHOTOGRAPHS

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Product Piping



Drain Piping



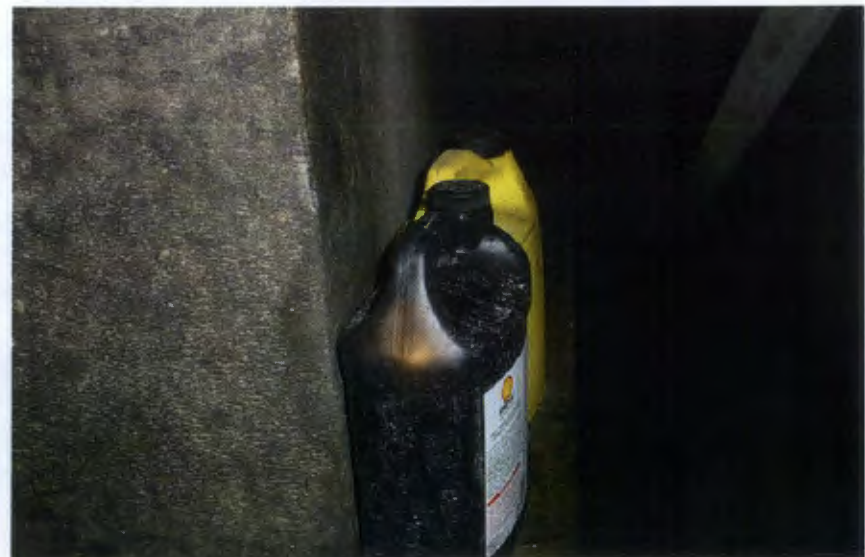
View of Internal Components



View of Internal Components



Oil Skimmer



House Keeping Issues

11/11/04
3/2

**HAZARDOUS WASTE SYSTEMS INTEGRITY
INSPECTION REPORT
FOR DTSC COMPLIANCE**

OWENS-BROCKWAY
WASTE/USED OIL TANK
OAKLAND PLANT
OAKLAND, CA
DECEMBER 7, 2004



Prepared by:
HMT Inspection
A Division of HMT Inc.
250 W. Channel Rd., Suite D
Benicia, CA 94510
(707) 747-0444

INTRODUCTION

Owens-Brockway contracted with HMT Inspection, a division of HMT Inc. The purpose of the contract was to provide inspection services for the Waste/Used Oil Tank. The tank is located at the Oakland Plant in Oakland, CA.

On December 7, 2004 HMT Inspection performed an external visual In-Service assessment to confirm the current status of the Waste/Used Oil tank and associated piping connected with this tank at your plant in Oakland, CA.

It should be noted that the terms "tank" and "containment area" are used in this document as defined in CA DTSC regulations.

HMT Inspection provided the following personnel:

Nelson Acosta, P.E.
API 653 Certified Tank Inspector
Certification Number: 0272
California Registered Professional Engineer No. C57820 (Civil)

Matthew K. Orr
API 653 Certified Tank Inspector
Certification Number: 6158
API 570 Certified Piping Inspector
Certification Number 23186
Level II Technician

Mike Domrzalski
Technician

SUITABILITY FOR SERVICE STATEMENT

The Waste/Used Oil Tank is suitable for service according to the applicable criteria of API Standard 653.

The Waste/Used Oil Tank has also been evaluated for compliance with California Dept. of Toxic Substances Control (DTSC) regulations regarding the storage of hazardous waste and was found to be acceptable per the requirements of Title 22, Division 4.5, Chapter 14, Article 10, Para. 66265.192 as amended. This assessment will be valid for a period not exceeding one (1) year from the date given above or until the next external inspection and assessment if done prior to the end of that period

Certification per Title 22, Section 66270.11

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Nelson J. Acosta, P.E.
Manager of Engineering

Date

**Hazardous Waste Systems Integrity Report
for
Owens-Brockway
Waste/Used Oil Storage Tank
Oakland, CA**



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**Hazardous Waste Systems Integrity Report
for
Owens-Brockway
Waste/Used Oil Storage Tank
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1.0 DESCRIPTION

GENERAL:

DATE OF INSPECTION:	December 7, 2004
OWNER:	Owens-Brockway
DESIGN STANDARD:	Underwriters Laboratories Inc. (UL)
VESSEL LOCATION:	Oakland, CA
MANUFACTURER:	N.J. McCutchen Inc.
MATERIALS:	Carbon Steel
HEADS:	Carbon Steel
SHELL:	Carbon Steel
SERVICE / PROCESS:	Waste/Used Oil
NAME PLATE DATA:	Yes
MFG. S/N:	No Data Available

DIMENSIONS:

INSIDE DIAMETER:	6.25 ft.
TANGENT LENGHT/HEIGHT	17.0 ft.
NOMINAL SHELL THICKNESS:	0.187 in.
NOMINAL HEAD THICKNESS:	0.187 in.

GEOMETRY:

FOUNDATION:	Concrete Saddles (2) on Concrete Slab
VESSEL ORIENTATION:	Horizontal
HEAD TYPE:	Carbon Steel
CIRCUMFERENTIAL WELDS:	Butt Welded
LONGITUDINAL WELDS:	Butt Welded

DATES:

YEAR BUILT:	1986
LAST COATED:	No Data Available
LAST INSPECTION:	No Data Available

ACCESS:

STAIRWAY:	Ladder
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**Hazardous Waste Systems Integrity Report
for
Owens-Brockway
Waste/Used Oil Storage Tank
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2.0 SUMMARY AND REPAIR RECOMMENDATIONS

The following is a summary of the significant findings of the inspection.

Inspection of the Waste/Used Oil tank at the Oakland plant did not reveal any areas of significant metal loss, defects, or anomalies that would require immediate corrective action at this time. Reference Section 4.0 for physical description, diagram and containment area layouts of the tank inspected.

FOUNDATION: Due to recent heavy rains, there is 4 inches of standing water inside the containment wall. In addition, there is debris with miscellaneous equipment such as hoses and plastic piping present. The water should be removed and the containment area not used for storage for miscellaneous plant equipment.

The tank rests on concrete saddles that are in acceptable condition at this time.

SHELL: Visual (VT) inspection of the external shell found the coating to be weathered with areas of random failure present. Consideration should be given to cleaning and re-coating the tank shell at this time.

Ultrasonic (UT) thickness data was collected at random locations. No areas of significant metal loss were detected. Reference Section 8.0 for Ultrasonic (UT) data. No internal Visual (VT) inspection was performed at this time since the tank was in service.

NOZZLES AND APPURTENANCES: Visual (VT) inspection of the nozzles found that the coating is weathered with areas of random failure present. Consideration should be given to cleaning and re-coating the nozzles at this time.

All shell nozzles have threaded connections with product stains present at some. Consideration should be given to replacing these nozzles with new API flanged nozzle details the next time the tank is taken out of service

The existing float system utilizes a 1-inch diameter hole in the top of the tank in lieu of a standard coupling or nozzle detail. Consideration should be given to replacing this detail with a new API flanged nozzle the next time the tank is taken out of service

All valves should be serviced during the next scheduled out-of-service period.

**Hazardous Waste Systems Integrity Report
for
Owens-Brockway
Waste/Used Oil Storage Tank
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SUMMARY AND REPAIR RECOMMENDATIONS (Continued)

NOZZLES AND APPURTENANCES: The tank currently does not have a high-level alarm. Consideration should be given to installing a high-level alarm system or alternative overfill protection device at the next out-of-service interval.

SECONDARY CONTAINMENT EVALUATION: The original existing secondary containment details included a 31-inch high by 23.75-foot long by 9.33-foot wide concrete wall and these details were inadequate for the capacity of the tank. Also, deterioration of the concrete was such that it warranted repair. The height of the existing containment wall was increased to 48 inches to comply with the inadequate containment volume. In addition, the cold joints need to be sealed or the entire containment area coated to comply with existing DTSC requirements for secondary containment details.

ADDITIONAL COMMENTS: The next external API 653 inspection should be conducted within 5 years and no later than December 2009 (ref. API 653, Para. 6.3.2.1).

**Hazardous Waste Systems Integrity Report
for
Owens-Brockway
Waste/Used Oil Storage Tank
Oakland, CA**



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3.0 SUITABILITY FOR SERVICE

Evaluation for DTSC Compliance

The results of our limited In-Service external inspection indicates that the current condition of this tank is acceptable for continued service for a period of one (1) year based on the fact that a new secondary containment wall has been installed.

We have evaluated this tank, connecting piping and surrounding area in accordance with the specified requirements of California Dept. of Toxic Substances Control Regulations 66265.190 through 66265.200 (as applicable) and find the following to be true:

- Pursuant to 66265.191 (a)(1), this structure now contains and will continue to contain for the foreseeable future products that can be classified as liquids falling within the CA DTSC regulations;
- Pursuant to 66265.191 (a)(1)(A) and (B), this structure is of sufficient capacity as to not be exempt from this regulation;
- Pursuant to 66265.191(b)(5)(B), the concrete containment floor under this tank has also been adequately designed to ACI 318 criteria and has sufficient wall thickness, structural strength and product compatibility to store this liquid on a long-term basis without collapse, rupture or failure;
- Pursuant to 66265.191(e)(1), the tank has secondary containment details that meet the requirements of 66265.193; It should be noted that a new secondary containment detail was installed after this visual inspection was performed. Confirmation that the containment is lined with a coating that makes these surfaces sufficiently impervious to leaks and spills and that has acceptable product compatibility to store this RCRA hazardous waste until such leaks or spills are detected and removed was not possible at this inspection.

**Hazardous Waste Systems Integrity Report
for
Owens-Brockway
Waste/Used Oil Storage Tank
Oakland, CA**



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SUITABILITY FOR SERVICE (Continued)

Waste/Used Oil Storage Tank

(b)(1) The tank is designed and manufactured to Underwriters Laboratories (UL) criteria. This tank has been adequately designed according to accepted industry practice for a horizontal storage tank and has sufficient structural strength and product compatibility to store RCRA hazardous wastes on a long-term basis without collapse, rupture or failure. This tank now contains and will continue to contain for the foreseeable future products that can be classified as RCRA hazardous wastes;

(b)(2) The tank is constructed of carbon steel and is compatible with the intended hazardous waste product storage.

Material thickness for shell and heads: Shell = 0.187 inch
(from ultrasonic thickness (UT) collection) Heads = 0.187 inch

(b)(3) This tank is above ground and not in direct contact with soil or groundwater on a continuous or consistent basis, therefore this requirement is not applicable.

(b)(3)(A)(1) through (8) This tank is not in contact with soil and these requirements are not applicable.

(b)(3)(B)(1) through (3) This tank is not in direct contact with soil or water and is constructed of coated carbon steel material.

(b)(4) This tank is above ground, not underground, and within a separate containment area not accessible to vehicular or other plant traffic on an uncontrolled basis, therefore this requirement is not applicable.

(b)(5)(A) Currently installed foundation details include a full concrete slab with concrete saddles adequate to support the loading imposed by the stored waste oil in this tank.

(b)(5)(B) The tank rests on two (2) separate concrete saddle supports. These saddles are raised above the level of the containment floor and are not subject to external liquid loads that might result in flotation when empty or nearly so.

(b)(5)(C) Since this tank is not in direct contact with the ground and is in a location not subject to extended low temperatures in winter weather, they are not subject to frost heave and this requirement is not applicable.

**Hazardous Waste Systems Integrity Report
for
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SUITABILITY FOR SERVICE (Continued)

(b)(6) The tank configuration is horizontal and cylindrical with major outside dimensions of 17.0 ft. in length x 6.25 ft. in diameter and has a working capacity of approximately 3,900 gallons (tank is not operated completely full). Secondary containment to prevent leakage into the ground is provided by a suitably sized concrete containment wall. Verification of suitable coating applied over the floor and walls (i.e. cold joints) of the concrete containment area was not possible during this inspection.

(c)(1) through (6) The condition of this tank at the time of inspection was such that there are no structural integrity issues (no cracks, corrosion, punctures) visible and no installation issues evident (no obvious tank construction defects) that would result in possible leaks from the tank. The current condition of the tank walls and heads indicates no leaks when full of product.

(d) This tank is above ground and this backfill requirement is not applicable.

(e) This tank was visually and ultrasonically tested for leak integrity and no leaks were detected.

(f) There is no permanent ancillary equipment within the containment area associated with the operation of this tank, therefore, this requirement is not applicable.

(g) This tank is constructed of coated carbon steel material that is compatible with the stored waste oil and does not require further independent corrosion protection.

(h) This report includes the appropriate certification statement required under Section 66270.11(d) on the Suitability for Service Statement page at the beginning of this report.

<p style="text-align: center;">Hazardous Waste Systems Integrity Report for Owens-Brockway Waste/Used Oil Storage Tank Oakland, CA</p>	<div data-bbox="1136 176 1351 235" data-label="Image"></div> <p style="text-align: center;">HMT Inspection</p> <hr/> <p style="text-align: right;">Dec. 7, 2004 Page 11 of 28</p>
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SUITABILITY FOR SERVICE (Continued)

Waste/Used Oil Tank Storage Area

- Pursuant to 66265.175(a), this containment area has now and will continue to contain for the foreseeable future wastes that can be classified as RCRA hazardous wastes;
- Pursuant to 66265.175(b), the following assessment details are known or have been evaluated:
 - (b)(1), the containment area has been adequately designed to ACI 318-77 design requirements. Confirmation that the containment is lined with a coating that makes these surfaces sufficiently impervious to leaks and spills and that has acceptable product compatibility to store this RCRA hazardous waste until such leaks or spills are detected and removed was not possible during this inspection;
 - (b)(2), the containment floor has a concrete wall surrounding it on all 4 sides (now approximately 48 inches high) and the waste storage tank is of carbon steel construction stored up off the containment floor on concrete saddles to avoid direct contact with any spills or liquid accumulations;
 - (b)(3) This tank storage area is exposed to the weather, therefore, this area is subject to the 24-hour, 25-year storm (7.0 in. of rain for this location) plus 10% of the aggregate volume of the storage therein and meets this volume requirement based on the area contained and height of the walls (886.35 cu. ft. available volume vs. 650.85 cu. ft. minimum volume required);
 - (b)(4) Currently installed details include a full concrete slab foundation with a concrete wall on all 4 sides. There is full exposure to normal weathering environment and no run-on liquid collection is possible into the area with this arrangement;
 - (b)(5) The hazardous waste area inspection plan currently in place provide for any leakage or spills from the tanks in this area to be cleaned up as soon as detected (visual inspection of this area is performed on a daily basis).
- (c) This report meets the requirements of 66265.175 (c).
- Pursuant to 66265.175(d), this requirement is not applicable as there are free liquids present in the tanks in this area.
- Pursuant to 66265.175(e), this requirement is not applicable as there are free liquids present in the tanks in this area.

**Hazardous Waste Systems Integrity Report
for
Owens-Brockway
Waste/Used Oil Storage Tank
Oakland, CA**



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SUITABILITY FOR SERVICE (Continued)

Waste/Used Oil Tank Storage Area (cont'd.)

There is no waste treatment performed in this containment area where the waste materials are stored. No concern is attached to this storage arrangement under the conditions seen at the site and as described further herein.

We believe that the above information provides the assessment of Owens-Brockway Waste/used Oil Tank Storage Area at Oakland, CA that is required by California DTSC requirements for structures containing RCRA hazardous wastes. This report is intended to provide adequate documentation for that purpose.

Based on information provided by Owens-Brockway, no chemical reactions or subsequent temperature rise from such reactions are anticipated. Thermal cycling of tank contents is possible due to changes in ambient air temperatures and direct exposure to sunlight. These factors may raise the temperature of the waste stream a small amount (on the order of 5 to 10 °F or less) but this heat would be dissipated very quickly in this volume of stored liquid. No concern is attached to this part of the process regarding performance of the tank.

- Pursuant to 66265.192, these requirements are applicable since all systems inspected exist and have been in service.
- Pursuant to 66265.193, the tank does currently comply with the requirements for secondary containment details as outlined in this regulation. The associated piping outside the confines of the containment building does not have secondary containment.
- Pursuant to 66265.194, the tank has sufficient excess capacity during normal operations.
- Compliance with, or input regarding applicability or method of compliance in the future, for regulations 66265.195 through 66265.200 will be supplied directly by Owens Brockway as appropriate in the regulatory review process.

4.1 HORIZONTAL LAYOUT



DRAWING NOT TO SCALE







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NOZZLES

- A = 4" THREADED NOZZLE
B = 4" THREADED NOZZLE
C = 4" THREADED NOZZLE/
INLET FROM SCIMMER
D = 1" GAUGE FLOAT SYSTEM
E = 20" MANWAY
F = 4" THREADED NOZZLE/
WATER OUTLET TO OIL SCIMMER
G = 4" THREADED NOZZLE/DRAW
H = 4" THREADED NOZZLE

GENERAL

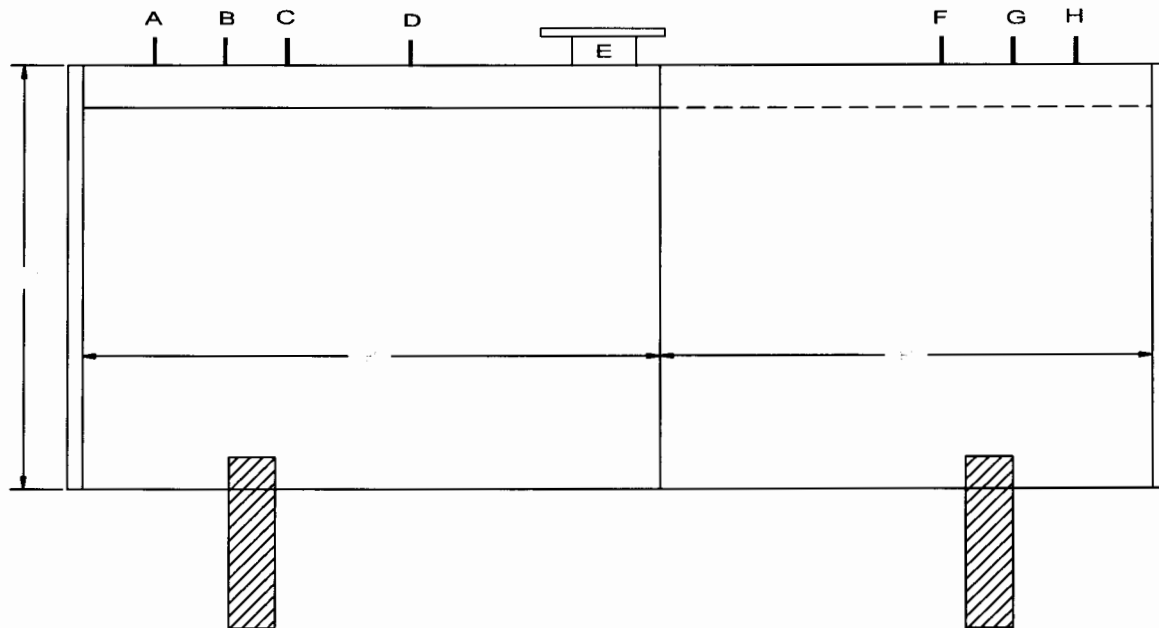
PROGRAM NAME : AUTO CAD LT.
LAYER NOZZLES = NOZZLES
LAYER INDICATIONS = INDICATIONS

- | | |
|---|--|
|  | HOLE |
|  | TOP SIDE INDICATION |
|  | SOIL SIDE INDICATION |
|  | TOP SIDE / SOIL SIDE INDICATION |
|  | TOP SIDE / SOIL SIDE / HOLE INDICATION |
|  | REFERENCE CORNER |

LEGEND

	
250 W. CHANNEL RD. SUITE D BENICIA, CA 94510	
TITLE HORIZONTAL LAYOUT CONTAINMENT SYSTEM	
CUSTOMER OWENS-BROCKWAY	
TANK NO. WASTE/USED OIL	JOB NO. 60780
DRAWN BY R.B.K.	DATE 12-7-04

4.2 HORIZONTAL FRONT-VIEW LAYOUT



DRAWING NOT TO SCALE

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NOZZLES

A = 4" THREADED NOZZLE
 B = 4" THREADED NOZZLE
 C = 4" THREADED NOZZLE/
 INLET FROM SCIMMER
 D = 1" GAUGE FLOAT SYSTEM
 E = 20" MANWAY
 F = 4" THREADED NOZZLE/
 WATER OUTLET TO OIL SCIMMER
 G = 4" THREADED NOZZLE/DRAW
 H = 4" THREADED NOZZLE

GENERAL

PROGRAM NAME : AUTO CAD LT.
 LAYER NOZZLES = NOZZLES
 LAYER INDICATIONS = INDICATIONS

△ HOLE
 ○ TOP SIDE INDICATION
 □ SOIL SIDE INDICATION
 ⊗ TOP SIDE / SOIL SIDE INDICATION
 ⊕ TOP SIDE / SOIL SIDE / HOLE INDICATION
 L-x REFERENCE CORNER

LEGEND

INSPECTION	
250 W. CHANNEL RD. SUITE D	
BENICIA, CA. 94510	
TITLE HORIZONTAL LAYOUT	
FRONT VIEW	
CUSTOMER	
OWENS-BROCKWAY	
DATE NO.	JOB NO.
WASTE/USED OIL	60780
DRAWN BY	DATE
R.B.K.	12-7-04

**Hazardous Waste Systems Integrity Report
for
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5.0 INSPECTION CHECKLIST

✓		DESCRIPTION	COMMENTS
Y	1.	Inspect foundation for damage.	Saddles – Acceptable Containment Wall - Reference Section 2.0
Y	2.	Search for indications of leakage.	None found, Acceptable
Y	3.	Inspect for cavities and vegetation around foundation	Acceptable
Y	4.	Check for proper water runoff and drainage away from the foundation.	4 in. of standing water inside containment with debris present (hoses; garbage; plastic piping, etc.)
Y	5.	Check for settlement around the foundation for the vessel.	Visual – Acceptable
N	6.	Inspect vessel skirt and anchor bolts (if present).	Support details Acceptable
Y	7.	Inspect for coating failure, pitting and corrosion.	Coating weathered with random failure
Y	8.	Visually inspect entire vessel surface (shell and heads) for leaks or corrosion.	Acceptable
N	9.	Inspect vessel insulation (if present) note condition and damage (if any)	N/A
Y	10.	Check support welds to vessel for corrosion or defects.	Ladder attachments/ misc. pump stands – Acceptable
Y	11.	Visually inspect entire vessel (shell and heads) for bulges or deformation.	Acceptable
Y	12.	Check piping, valves flanges and bolting for leaks or signs of damage.	Item C product stains @ threaded connections. Float system has 1 in. dia. hole in top of vessel.
Y	13.	Inspect for signs of corrosion or other defects around all manways, nozzles, and attachments.	Reference Section 2.0
Y	14.	Inspect all pressure relieving devices and record data on vessel nozzle table.	Acceptable
N	15.	Conduct Ultrasonic Thickness readings of entire vessel (shell and heads). Record all data.	Reference Section 8.0, Tables A & B for UT readings
Y	16.	Inspect vessel access structures, ladders, stairway cages and handrails.	Acceptable

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for
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5.1 TANK NOZZLE TABLE

Item	Description	Pipe Size (in.)	Location	Neck Thick (in.)	Comments
A	Nozzle	4.0	Top North	-	threaded/ capped
B	Nozzle	4.0	Top North	-	threaded/plugged
C	Nozzle	4.0	Top North	-	threaded
D	Gauge Float	1.0 (Hole)	Top Center	-	0.250 in. shaft attached to mechanical gauge
E	Manway	20.0	Top Center	0.240	flange = 0.370 in. cover = 0.246 in.
F	Nozzle	4.0	Top South	-	threaded
G	Nozzle	4.0	Top South	-	Out of service/ threaded
H	Nozzle	4.0	Top South		with 2.5 in. coupling – capped/threaded

**Hazardous Waste Systems Integrity Report
for
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Waste/Used Oil Storage Tank
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6.0 NDE INSPECTION

6.1 NDE INSPECTION SCOPE

The following Nondestructive Examinations (NDE) were conducted to evaluate the physical characteristics of the tank:

- A) Visual Inspection (VT) of all accessible areas for the detection of anomalies or significant defects that may affect the tank integrity.
- B) Random UT thickness readings on the tank shell for the detection of significant internal metal loss. Performed in accordance with HMT UT Procedure No. 1611.1, Revision No. 1.

**Hazardous Waste Systems Integrity Report
for
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7.0 EQUIPMENT

7.1 ULTRASONIC

The UT equipment utilized for the inspection was a Krautkramer USN-52R Flaw Detector.

The transducer utilized was a KBA Model FH2E-WR, 7.5 MHz, 0.375 inch dual element and a Xactex CM-HR, 5.0 MHz, 0.250 inch single element.

Ultragel and water were used as a couplant.

The calibration block utilized was a 5 step, 4340 steel test block.

**Hazardous Waste Systems Integrity Report
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8.0 TABLES

**TABLE A
SHELL READINGS
(in inches)**

READING	EAST	BOTTOM	WEST	TOP
1	0.156	0.183	0.179	0.182
2	0.176	0.164	0.181	0.185
3	0.162	0.185	0.181	0.185
4	0.164	0.156	0.181	0.182
5	0.162	0.159	0.171	0.181
6	0.153	0.160	0.154	0.185
7	0.179	0.159	0.161	0.183
8	0.180	0.176	0.181	0.183
9	0.181	0.180	0.179	0.185
10	0.181	0.156	0.180	0.185

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**TABLE B
HEAD READINGS
(in inches)**

Tank Head readings were taken in a X-pattern along north to south and east to west lines.

NORTH HEAD

Location	READING
1	0.191
2	0.192
3	0.189
4	0.172
5	0.191
6	0.193
7	0.189
8	0.187
9	0.190
10	0.190

SOUTH HEAD

Location	READING
1	0.196
2	0.194
3	0.194
4	0.176
5	0.192
6	0.169
7	0.174
8	0.172
9	0.196
10	0.196

**Hazardous Waste Systems Integrity Report
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HMT Inspection

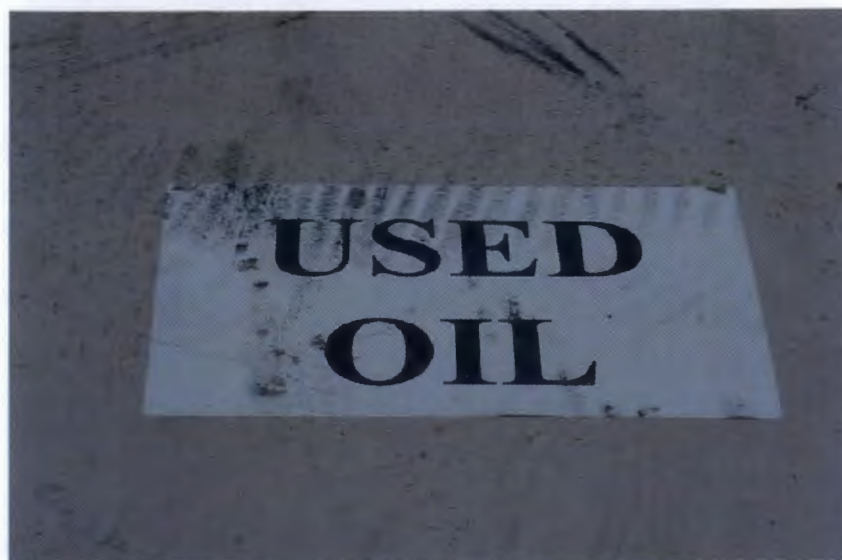
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9.0 WARRANTY

WARRANTY

HMT Inspection, a division of HMT Inc. has evaluated the condition of this tank based on the observations and measurements made by the HMT Inspection Tank Inspector. While our evaluation accurately describes the condition of the tank at the time of inspection, the tank owner/operator must independently assess the inspection information/report provided by HMT Inspection and any conclusions reached by the tank owner/operator and any action taken or omitted to be taken are the sole responsibility of the owner/operator. With respect to inspection and testing, HMT Inspection warrants only that the services have been performed in accordance with accepted industry practice. If any such services fail to meet the foregoing warranty, HMT Inspection shall re-perform the service to the same extent and on the same conditions as the original service.

The preceding paragraph sets forth the exclusive remedy for claims based on failure or of defect in materials or services, whether such claim is made in contract or tort (including negligence) and however instituted, and, upon expiration of the warranty period, all such liability shall terminate. The foregoing warranty is exclusive and in lieu of all other warranties, whether written, oral, implied or statutory. NO IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR PURPOSE SHALL APPLY, nor shall HMT Inspection be liable for any loss or damage whatsoever by reason of its failure to discover, report, repair or modify latent defects or defects inherent in the design of any tank inspected. In no event, whether a result of breach of contract, warranty or tort (including negligence) shall HMT Inspection be liable for any consequential or incidental damages including, but not limited to, loss of profit or revenues, loss of use of equipment tested or services by HMT Inspection or any associated damage to facilities, down-time costs or claims of other damages.



Used Oil

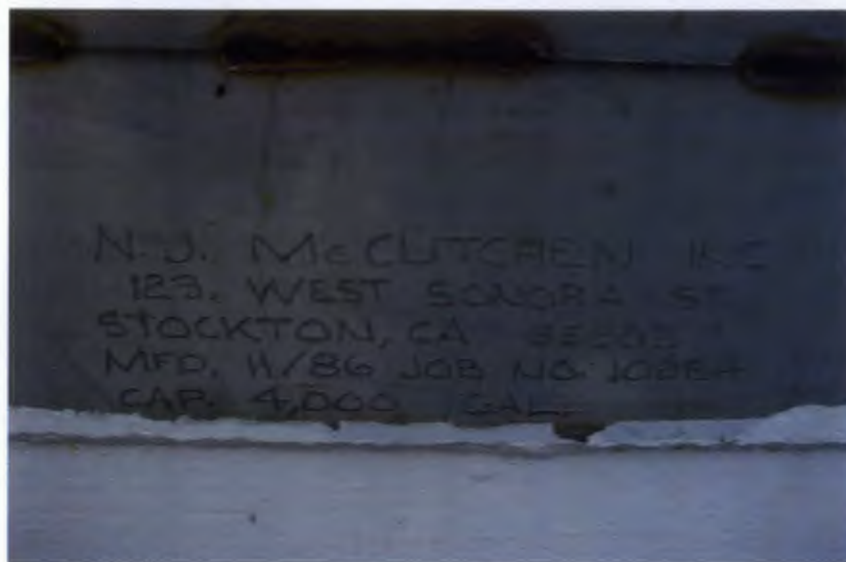


Used Oil Tank Standoff



Used Oil Tank Standoff

9.0 PHOTOGRAPHS



Data Plate



Data Plate



Containment Wall



Condition Of Containment Wall

9.0 PHOTOGRAPHS

Page 24 of 28



Foundation Saddle



Foundation Saddle



Foundation Saddle



Saddle Gasket

9.0 PHOTOGRAPHS

Page 25 of 28



Saddle Gasket



Nozzles A & B



Gauge Float System D



Hole In Tank For Float System

9.0 PHOTOGRAPHS



Manway E



Water Outlet to Oil Skimmer



Nozzles G & H



Nozzle G Piping

9.0 PHOTOGRAPHS



Ladder Detail



Pump Stand



Debris & Equipment



Debris & Equipment



New Secondary Containment



New Secondary Containment

CAT 000 618412

Part A 7A-2





Curtis & Tompkins, Ltd., Analytical Laboratories, Since 1878

2323 Fifth Street, Berkeley, CA 94710, Phone (510) 486-0900

Laboratory Job Number 226031
ANALYTICAL REPORT

Owens Brockway
3200 Alameda Ave.
Oakland, CA 94601

Project : STANDARD

Level : II

Sample ID
OILY GLOVES

Lab ID
226031-001

This data package has been reviewed for technical correctness and completeness. Release of this data has been authorized by the Laboratory Manager or the Manager's designee, as verified by the following signature. The results contained in this report meet all requirements of NELAC and pertain only to those samples which were submitted for analysis. This report may be reproduced only in its entirety.

Signature: *Devin N. Titus*
Project Manager

Date: 02/23/2011

NELAP # 01107CA

CASE NARRATIVE

Laboratory number: 226031
Client: Owens Brockway
Request Date: 02/17/11
Samples Received: 02/17/11

This data package contains sample and QC results for one cloth sample, requested for the above referenced project on 02/17/11. The sample was received intact.

TPH-Purgeables and/or BTXE by GC (EPA 8015B):

No analytical problems were encountered.

TPH-Extractables by GC (EPA 8015B):

No analytical problems were encountered.

Metals (EPA 6010B and EPA 7471A):

Low recovery was observed for mercury in the MSD for batch 172021; the parent sample was not a project sample, and the associated RPD was within limits. No other analytical problems were encountered.

ct **Curtis & Tompkins Laboratories**
ENVIRONMENTAL ANALYTICAL TESTING LABORATORY
In Business Since 1878

Phone (510) 486-0900
Fax (510) 486-0532

Page 1 of 1
Chain of Custody # _____

Project No:	Sampler: Bill Boscacci
Project Name:	Report To: Bill Boscacci
Project P. O. No:	Company: Owens Illinois
EDD Format: Report Level <input type="checkbox"/> II <input type="checkbox"/> III <input type="checkbox"/> IV	Telephone: 510-436-2166
Turnaround Time: <input checked="" type="checkbox"/> RUSH 3 day <input type="checkbox"/> Standard	Email: bill.boscacci@o-i.com

[illegible]

ANALYTICAL REQUEST	
CAM 17	
TPH (Gas, diesel, motor oil)	
X	
X	

Notes:
email with cost
to generate P.O.

SAMPLE RECEIPT

- ☐ Intact
☐ Cold
☐ On Ice
☐ Ambient

RELINQUISHED BY:

DATE: 2/17/4 TIME: 1230

DATE: TIME:

DATE: TIME:

RECEIVED BY:

Device: *Intuit* DATE: *2/17/11* TIME: *1230*

DATE: TIME:

DATE: TIME:

COOLER RECEIPT CHECKLIST



Curtis & Tompkins, Ltd.

Login # 226031 Date Received 2/17/11 Number of coolers 1
 Client OWENS Project _____
 Date Opened 2/17/11 By (print) R. Paris (sign) [Signature]
 Date Logged in ↓ By (print) ↓ (sign) ↓

1. Did cooler come with a shipping slip (airbill, etc) _____ YES NO
 Shipping info _____
- 2A. Were custody seals present? ... ☐ YES (circle) on cooler on samples NO
 How many _____ Name _____ Date _____
- 2B. Were custody seals intact upon arrival? _____ YES NO N/A
3. Were custody papers dry and intact when received? _____ YES NO
4. Were custody papers filled out properly (ink, signed, etc)? _____ YES NO
5. Is the project identifiable from custody papers? (If so fill out top of form) _____ YES NO
6. Indicate the packing in cooler: (if other, describe) _____
☐ Bubble Wrap ☐ Foam blocks ☒ Bags ☐ None
☐ Cloth material ☐ Cardboard ☐ Styrofoam ☐ Paper towels

7. Temperature documentation:

- Type of ice used: ☐ Wet ☐ Blue/Gel ☒ None Temp(°C) _____
☐ Samples Received on ice & cold without a temperature blank
☐ Samples received on ice directly from the field. Cooling process had begun

8. Were Method 5035 sampling containers present? _____ YES NO
 If YES, what time were they transferred to freezer? _____
9. Did all bottles arrive unbroken/unopened? _____ YES NO
10. Are samples in the appropriate containers for indicated tests? _____ YES NO
11. Are sample labels present, in good condition and complete? _____ YES NO
12. Do the sample labels agree with custody papers? _____ YES NO
13. Was sufficient amount of sample sent for tests requested? _____ YES NO
14. Are the samples appropriately preserved? _____ YES NO N/A
15. Are bubbles > 6mm absent in VOA samples? _____ YES NO N/A
16. Was the client contacted concerning this sample delivery? _____ YES NO
 If YES, Who was called? _____ By _____ Date: _____

COMMENTS

no label present on sample when rec'd

Total Volatile Hydrocarbons

Lab #:	226031	Prep:	EPA 5030B
Client:	Owens Brockway	Analysis:	EPA 8015B
Project#:	STANDARD		
Field ID:	OILY GLOVES	Sampled:	02/14/11
Units:	mg/Kg	Received:	02/17/11
Basis:	as received	Analyzed:	02/22/11
Batch#:	172006		

Type:	SAMPLE	Matrix:	Miscell.
Lab ID:	226031-001	Diln Fac:	5.000

Analyte	Result	RL
Gasoline C7-C12	ND	10

Surrogate	%REC	Limits
Bromofluorobenzene (FID)	84	67-140

Type:	BLANK	Matrix:	Soil
Lab ID:	QC580700	Diln Fac:	1.000

Analyte	Result	RL
Gasoline C7-C12	ND	0.20

Surrogate	%REC	Limits
Bromofluorobenzene (FID)	107	67-140

Batch QC Report

Total Volatile Hydrocarbons			
Lab #:	226031	Prep:	EPA 5030B
Client:	Owens Brockway	Analysis:	EPA 8015B
Project#:	STANDARD		
Type:	LCS	Diln Fac:	1.000
Lab ID:	QC580699	Batch#:	172006
Matrix:	Soil	Analyzed:	02/22/11
Units:	mg/Kg		

Analyte	Spiked	Result	%REC	Limits
Gasoline C7-C12	1.000	0.9710	97	79-121

Surrogate	%REC	Limits
Bromofluorobenzene (FID)	115	67-140

Batch QC Report

Total Volatile Hydrocarbons			
Lab #:	226031	Prep:	EPA 5030B
Client:	Owens Brockway	Analysis:	EPA 8015B
Project#:	STANDARD		
Field ID:	ZZZZZZZZZZ	Diln Fac:	1.000
MSS Lab ID:	226037-001	Batch#:	172006
Matrix:	Soil	Sampled:	02/17/11
Units:	mg/Kg	Received:	02/17/11
Basis:	as received	Analyzed:	02/22/11

Type: MS Lab ID: QC580701

Analyte	MSS Result	Spiked	Result	%REC	Limits
Gasoline C7-C12	0.09165	9.615	6.998	72	41-120

Surrogate	%REC	Limits
Bromofluorobenzene (FID)	110	67-140

Type: MSD Lab ID: QC580702

Analyte	Spiked	Result	%REC	Limits	RPD	Lim
Gasoline C7-C12	9.346	7.680	81	41-120	12	47

Surrogate	%REC	Limits
Bromofluorobenzene (FID)	117	67-140



Curtis & Tompkins, Ltd.

Total Extractable Hydrocarbons

Lab #:	226031	Prep:	EPA 3550B
Client:	Owens Brockway	Analysis:	EPA 8015B
Project#:	STANDARD		
Field ID:	OILY GLOVES	Sampled:	02/14/11
Units:	mg/Kg	Received:	02/17/11
Basis:	as received	Prepared:	02/17/11
Batch#:	171953	Analyzed:	02/18/11

Type:	SAMPLE	Matrix:	Miscell.
Lab ID:	226031-001	Diln Fac:	100.0

Analyte	Result	RL
Diesel C10-C24	95,000 Y	400
Motor Oil C24-C36	120,000	2,000

Surrogate	%REC	Limits
o-Terphenyl	DO	52-130
Hexacosane	DO	46-137

Type:	BLANK	Matrix:	Soil
Lab ID:	QC580491	Diln Fac:	1.000

Analyte	Result	RL
Diesel C10-C24	ND	1.0
Motor Oil C24-C36	ND	5.0

Surrogate	%REC	Limits
o-Terphenyl	116	52-130
Hexacosane	115	46-137

Y= Sample exhibits chromatographic pattern which does not resemble standard
DO= Diluted Out
ND= Not Detected
RL= Reporting Limit

Batch QC Report

Total Extractable Hydrocarbons			
Lab #:	226031	Prep:	EPA 3550B
Client:	Owens Brockway	Analysis:	EPA 8015B
Project#:	STANDARD		
Type:	LCS	Diln Fac:	1.000
Lab ID:	QC580492	Batch#:	171953
Matrix:	Soil	Prepared:	02/17/11
Units:	mg/Kg	Analyzed:	02/18/11

Cleanup Method: EPA 3630C

Analyte	Spiked	Result	%REC	Limits
Diesel C10-C24	49.94	47.72	96	44-151

Surrogate	%REC	Limits
o-Terphenyl	116	52-130
Hexacosane	113	46-137

Batch QC Report

Total Extractable Hydrocarbons			
Lab #:	226031	Prep:	EPA 3550B
Client:	Owens Brockway	Analysis:	EPA 8015B
Project#:	STANDARD		
Field ID:	ZZZZZZZZZZ	Batch#:	171953
MSS Lab ID:	226027-004	Sampled:	02/17/11
Matrix:	Soil	Received:	02/17/11
Units:	mg/Kg	Prepared:	02/17/11
Basis:	as received	Analyzed:	02/17/11
Diln Fac:	1.000		

Type: MS Cleanup Method: EPA 3630C
 Lab ID: QC580493

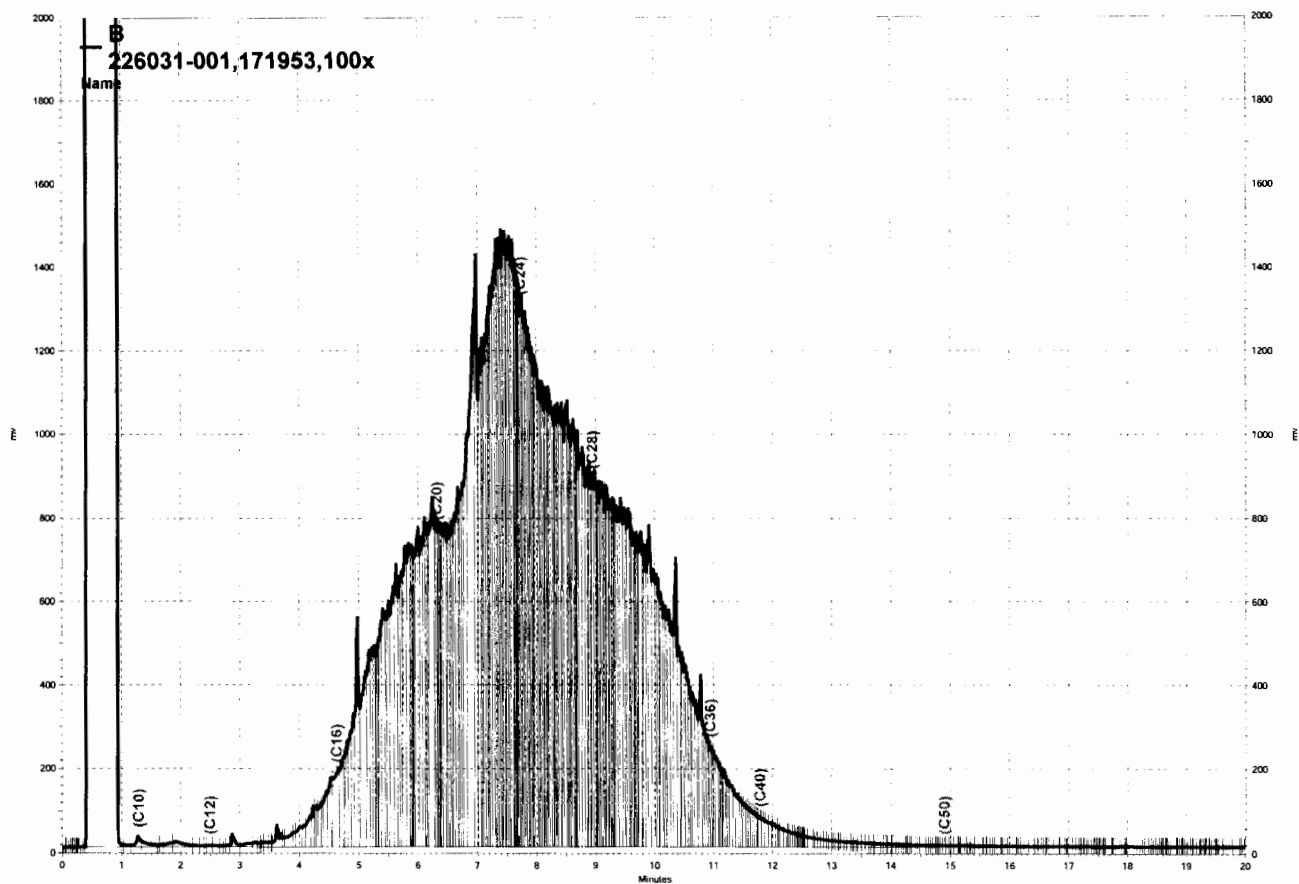
Analyte	MSS Result	Spiked	Result	%REC	Limits
Diesel C10-C24	4.993	50.34	53.39	96	39-146

Surrogate	%REC	Limits
o-Terphenyl	115	52-130
Hexacosane	108	46-137

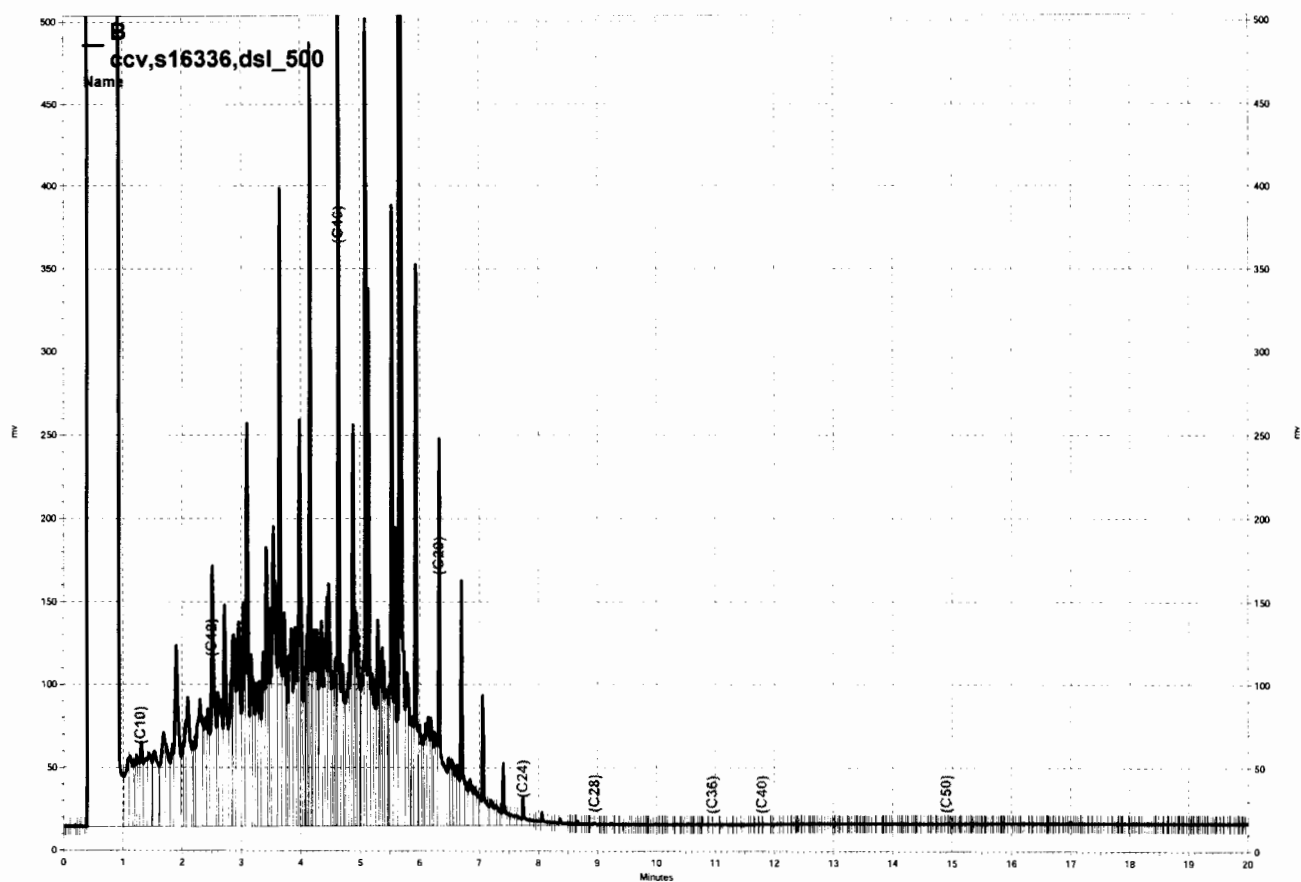
Type: MSD Cleanup Method: EPA 3630C
 Lab ID: QC580494

Analyte	Spiked	Result	%REC	Limits	RPD	Lim
Diesel C10-C24	49.96	49.99	90	39-146	6	61

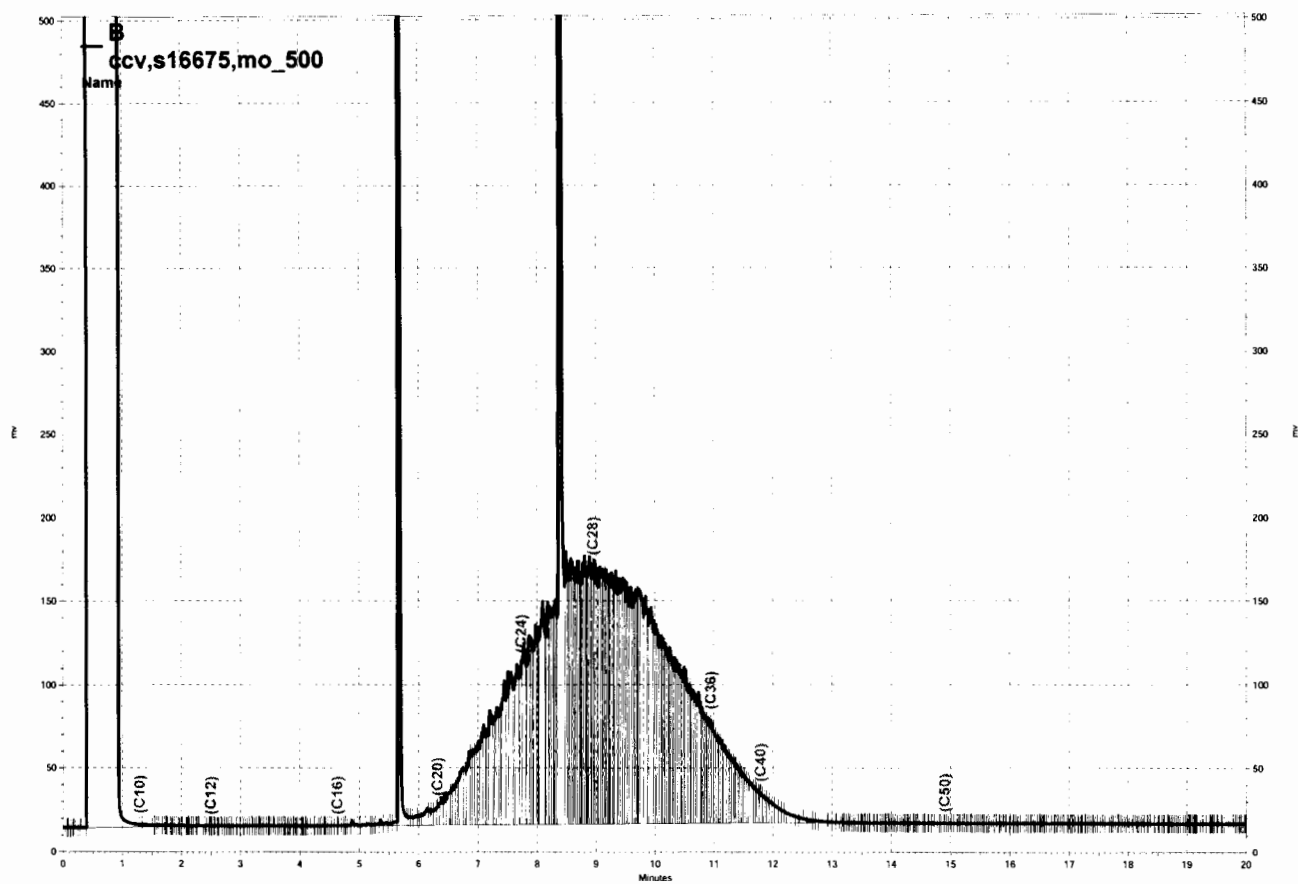
Surrogate	%REC	Limits
o-Terphenyl	109	52-130
Hexacosane	103	46-137



— \\Lims\gdrive\ezchrom\Projects\GC15B\Data\049b007, B



\\Lims\gdrive\ezchrom\Projects\GC15B\Data\048b017, B



\\Lims\gdrive\ezchrom\Projects\GC15B\Data\048b018, B



Curtis & Tompkins, Ltd.

California Title 22 Metals

Lab #:	226031	Project#:	STANDARD
Client:	Owens Brockway		
Field ID:	OILY GLOVES	Diln Fac:	1.000
Lab ID:	226031-001	Sampled:	02/14/11
Matrix:	Miscell.	Received:	02/17/11
Units:	mg/Kg	Prepared:	02/22/11
Basis:	as received		

Analyte	Result	RL	Batch#	Analyzed	Prep	Analysis
Antimony	55	0.50	172048	02/23/11	EPA 3050B	EPA 6010B
Arsenic	1.2	0.25	172048	02/23/11	EPA 3050B	EPA 6010B
Barium	6.3	0.25	172048	02/23/11	EPA 3050B	EPA 6010B
Beryllium	ND	0.10	172048	02/23/11	EPA 3050B	EPA 6010B
Cadmium	0.32	0.25	172048	02/23/11	EPA 3050B	EPA 6010B
Chromium	3.2	0.25	172048	02/23/11	EPA 3050B	EPA 6010B
Cobalt	4.2	0.25	172048	02/23/11	EPA 3050B	EPA 6010B
Copper	19	0.25	172048	02/23/11	EPA 3050B	EPA 6010B
Lead	6.1	0.25	172048	02/23/11	EPA 3050B	EPA 6010B
Mercury	ND	0.020	172021	02/22/11	METHOD	EPA 7471A
Molybdenum	1.8	0.25	172048	02/23/11	EPA 3050B	EPA 6010B
Nickel	96	0.25	172048	02/23/11	EPA 3050B	EPA 6010B
Selenium	1.3	0.50	172048	02/23/11	EPA 3050B	EPA 6010B
Silver	ND	0.25	172048	02/23/11	EPA 3050B	EPA 6010B
Thallium	ND	0.50	172048	02/23/11	EPA 3050B	EPA 6010B
Vanadium	2.6	0.25	172048	02/23/11	EPA 3050B	EPA 6010B
Zinc	94	1.0	172048	02/23/11	EPA 3050B	EPA 6010B

ND= Not Detected
RL= Reporting Limit
Page 1 of 1

Batch QC Report

California Title 22 Metals			
Lab #:	226031	Prep:	METHOD
Client:	Owens Brockway	Analysis:	EPA 7471A
Project#:	STANDARD		
Analyte:	Mercury	Diln Fac:	1.000
Type:	BLANK	Batch#:	172021
Lab ID:	QC580744	Prepared:	02/22/11
Matrix:	Soil	Analyzed:	02/22/11
Units:	mg/Kg		

Result	RL
ND	0.020

Batch QC Report

California Title 22 Metals			
Lab #:	226031	Prep:	METHOD
Client:	Owens Brockway	Analysis:	EPA 7471A
Project#:	STANDARD		
Analyte:	Mercury	Batch#:	172021
Matrix:	Soil	Prepared:	02/22/11
Units:	mg/Kg	Analyzed:	02/22/11
Diln Fac:	1.000		

Type	Lab ID	Spiked	Result	%REC	Limits	RPD	Lim
BS	QC580745	0.2500	0.2440	98	80-120		
BSD	QC580746	0.2500	0.2410	96	80-120	1	20

Batch QC Report

California Title 22 Metals			
Lab #:	226031	Prep:	METHOD
Client:	Owens Brockway	Analysis:	EPA 7471A
Project#:	STANDARD		
Analyte:	Mercury	Diln Fac:	1.000
Field ID:	ZZZZZZZZZZ	Batch#:	172021
MSS Lab ID:	225851-001	Sampled:	02/08/11
Matrix:	Soil	Received:	02/09/11
Units:	mg/Kg	Prepared:	02/22/11
Basis:	as received	Analyzed:	02/22/11

Type	Lab ID	MSS Result	Spiked	Result	%REC	Limits	RPD	Lim
MS	QC580747	0.2151	0.2500	0.4160	80	72-124		
MSD	QC580748		0.2451	0.3863	70 *	72-124	6	31

Batch QC Report

California Title 22 Metals			
Lab #:	226031	Prep:	EPA 3050B
Client:	Owens Brockway	Analysis:	EPA 6010B
Project#:	STANDARD		
Type:	BLANK	Diln Fac:	1.000
Lab ID:	QC580862	Batch#:	172048
Matrix:	Soil	Prepared:	02/22/11
Units:	mg/Kg	Analyzed:	02/23/11

Analyte	Result	RL
Antimony	ND	0.50
Arsenic	ND	0.25
Barium	ND	0.25
Beryllium	ND	0.10
Cadmium	ND	0.25
Chromium	ND	0.25
Cobalt	ND	0.25
Copper	ND	0.26
Lead	ND	0.25
Molybdenum	ND	0.25
Nickel	ND	0.25
Selenium	ND	0.50
Silver	ND	0.25
Thallium	ND	0.50
Vanadium	ND	0.25
Zinc	ND	1.0



Curtis & Tompkins, Ltd.

Batch QC Report

California Title 22 Metals			
Lab #:	226031	Prep:	EPA 3050B
Client:	Owens Brockway	Analysis:	EPA 6010B
Project#:	STANDARD		
Matrix:	Soil	Batch#:	172048
Units:	mg/Kg	Prepared:	02/22/11
Diln Fac:	1.000	Analyzed:	02/23/11

Type: BS Lab ID: QC580863

Analyte	Spiked	Result	%REC	Limits
Antimony	100.0	105.0	105	80-120
Arsenic	50.00	51.58	103	80-120
Barium	100.0	102.7	103	80-120
Beryllium	2.500	2.690	108	80-120
Cadmium	10.00	10.54	105	80-120
Chromium	100.0	101.9	102	80-120
Cobalt	25.00	24.87	99	80-120
Copper	12.50	12.73	102	78-120
Lead	100.0	100.6	101	80-120
Molybdenum	20.00	20.83	104	80-120
Nickel	25.00	24.92	100	80-120
Selenium	50.00	50.82	102	80-120
Silver	10.00	10.02	100	80-120
Thallium	50.00	50.49	101	80-120
Vanadium	25.00	25.49	102	80-120
Zinc	25.00	25.93	104	80-120

Type: BSD Lab ID: QC580864

Analyte	Spiked	Result	%REC	Limits	RPD	Lim
Antimony	100.0	105.8	106	80-120	1	20
Arsenic	50.00	51.67	103	80-120	0	20
Barium	100.0	97.54	98	80-120	5	20
Beryllium	2.500	2.541	102	80-120	6	20
Cadmium	10.00	10.43	104	80-120	1	20
Chromium	100.0	97.02	97	80-120	5	20
Cobalt	25.00	24.61	98	80-120	1	20
Copper	12.50	11.85	95	78-120	7	20
Lead	100.0	99.76	100	80-120	1	20
Molybdenum	20.00	20.55	103	80-120	1	20
Nickel	25.00	24.68	99	80-120	1	20
Selenium	50.00	50.51	101	80-120	1	20
Silver	10.00	9.542	95	80-120	5	20
Thallium	50.00	49.89	100	80-120	1	20
Vanadium	25.00	24.37	97	80-120	4	20
Zinc	25.00	25.78	103	80-120	1	20

Batch QC Report

California Title 22 Metals

Lab #:	226031	Prep:	EPA 3050B
Client:	Owens Brockway	Analysis:	EPA 6010B
Project#:	STANDARD		
Field ID:	ZZZZZZZZZZ	Batch#:	172048
MSS Lab ID:	225851-001	Sampled:	02/08/11
Matrix:	Soil	Received:	02/09/11
Units:	mg/Kg	Prepared:	02/22/11
Basis:	as received	Analyzed:	02/23/11
Diln Fac:	1.000		

Type: MS Lab ID: QC580865

Analyte	MSS Result	Spiked	Result	%REC	Limits
Antimony	10.97	98.04	48.66	38	7-120
Arsenic	6.225	49.02	53.08	96	66-122
Barium	57.45	98.04	141.0	85	51-135
Beryllium	0.5202	2.451	3.086	105	73-120
Cadmium	0.1023	9.804	9.790	99	64-120
Chromium	52.57	98.04	141.1	90	57-122
Cobalt	15.22	24.51	37.29	90	53-122
Copper	79.73	12.25	102.3	184 NM	33-157
Lead	20.32	98.04	105.7	87	52-123
Molybdenum	1.312	19.61	18.56	88	66-120
Nickel	52.83	24.51	73.64	85	42-137
Selenium	3.935	49.02	50.05	94	64-120
Silver	<0.07401	9.804	9.237	94	65-120
Thallium	<0.1614	49.02	44.06	90	55-120
Vanadium	56.04	24.51	76.63	84	49-139
Zinc	84.58	24.51	97.00	51	32-155

Type: MSD Lab ID: QC580866

Analyte	Spiked	Result	%REC	Limits	RPD	Lim
Antimony	90.09	48.09	41	7-120	6	44
Arsenic	45.05	49.96	97	66-122	1	35
Barium	90.09	126.9	77	51-135	5	42
Beryllium	2.252	2.721	98	73-120	6	22
Cadmium	9.009	9.059	99	64-120	1	36
Chromium	90.09	137.6	94	57-122	3	34
Cobalt	22.52	33.20	80	53-122	6	32
Copper	11.26	73.82	-52 NM	33-157	31	41
Lead	90.09	103.4	92	52-123	5	41
Molybdenum	18.02	18.01	93	66-120	5	20
Nickel	22.52	66.86	62	42-137	7	36
Selenium	45.05	48.56	99	64-120	5	28
Silver	9.009	8.975	100	65-120	6	27
Thallium	45.05	41.38	92	55-120	2	27
Vanadium	22.52	72.13	71	49-139	4	32
Zinc	22.52	94.06	42	32-155	1	45

NM= Not Meaningful: Sample concentration > 4X spike concentration
 RPD= Relative Percent Difference

**Leak Detection and Daily Inspection Checklist
for the Hazardous Waste Used Oil Tanks**

CL-50058
R-1-A 3A

For every day the Plant is operating, mark a Y = Yes if the daily inspection indicates the tank is intact. Or mark a N = No if the daily inspection indicates the tank is leaking and report this condition to the Plant Engineer

Month: <i>Feb. 2011</i> Date	A-01 A-Sump	A-02 D-Sump	A-03 Skim Pond Used Oil Tank
1	Y	Y	Y
2	Y	Y	Y
3	Y	Y	Y
4	Y	Y	Y
5	Y	Y	Y
6	Y	Y	Y
7	Y	Y	Y
8	Y	Y	Y
9	Y	Y	Y
10	Y	Y	Y
11	Y	Y	Y
12	Y	Y	Y
13	Y	Y	Y
14	Y	Y	Y
15	Y	Y	Y
16	Y	Y	Y
17	Y	Y	Y
18	Y	Y	Y
19	Y	Y	Y
20	Y	Y	Y
21	Y	Y	Y
22	Y	Y	Y
23			
24			
25			
26			
27			
28			
29			
30			
31			

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAT 000618918	2. Page 1 of 1	3. Emergency Response Phone 800 368 4778	4. Manifest Tracking Number 003501897 JJK					
5. Generator's Name and Mailing Address Owens Illinois Inc. Plant 20-Oakland 3600 Alameda Avenue Oakland CA 94604				Generator's Site Address (if different than mailing address) 3600 Alameda Avenue Oakland CA 94604						
6. Transporter 1 Company Name NRC Environmental Services Inc.				U.S. EPA ID Number CAR000030114						
7. Transporter 2 Company Name				U.S. EPA ID Number						
8. Designated Facility Name and Site Address US Ecology Hwy 95, 12 miles south Beatty, NV 89008				U.S. EPA ID Number NVT 330010000						
Facility's Phone: 775 553-2203										
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) 1. Hazardous Waste Solid, N.O.S., 9, NA3077, PG III (Cadmium, Chromium)			10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes D005 D007 D010		
				No.	Type					
				1	CM					
				12	Y					
				181						
14. Special Handling Instructions and Additional Information 961) 07-013-3287-0 Furnace/Checker Dust ER6# 981 171 ERSW.O.#62197 EcP Bin# V159										
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
Generator's/Officer's Printed/Typed Name WL Boscacci				Signature W L Boscacci		Month Day Year 10 08 10				
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____										
17. Transporter Acknowledgment of Receipt of Materials										
Transporter 1 Printed/Typed Name PAUL CANEVARO				Signature Paul Canevaro		Month Day Year 10 08 10				
Transporter 2 Printed/Typed Name				Signature		Month Day Year				
18. Discrepancy										
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection										
Manifest Reference Number:										
18b. Alternate Facility (or Generator) U.S. EPA ID Number										
Facility's Phone:										
18c. Signature of Alternate Facility (or Generator) Month Day Year										
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)										
1. H132		2.		3.		4.				
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a										
Printed/Typed Name Pat Rebujo				Signature Pat Rebujo		Month Day Year 10 09 10				

DTSC 01200-1337

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CA 000618918	2. Page 1 of 1	3. Emergency Response Phone (800) 368-4778	4. Manifest Tracking Number 005935888 JJK		
5. Generator's Name and Mailing Address OWENS ILLINOIS INC PLANT 20 - OAKLAND 3600 ALAMEDA AVENUE OAKLAND CA 94604				Generator's Site Address (if different than mailing address) 3600 ALAMEDA AVENUE OAKLAND CA 94604			
6. Transporter 1 Company Name BLUEWATER ENVIRONMENTAL SERVICES INC.				U.S. EPA ID Number CA0000192229			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address US ECOLOGY HWY 95, 12 MILES SOUTH BEATTY NV 89003				U.S. EPA ID Number NVT330010000			
Facility's Phone: (775)553-2203							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1	HAZARDOUS WASTE, SOLID, N.O.S., 9, NAS077, PGHI (CADMIUM, CHROMIUM)	1	CM	10	Y	D006 181
	2						
	3						
	4						
14. Special Handling Instructions and Additional Information 981)07-013-3287-0 - FURNACE / CHECKER DUST ERG# 981. 171 - ER5 W.O.#61576 - ECB BILL TO ENVIROSERV - WEAR PROPER PPE							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name W L Boscacci							
Signature W L Boscacci							
Month Day Year 11 11 10							
INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Part of entry/exit: Date leaving U.S.:						
	Transporter signature (for exports only):						
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name John Zamora						
DESIGNATED FACILITY	Signature John Zamora						
	Month Day Year 11 11 10						
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator) U.S. EPA ID Number							
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. A132 2. 3. 4.							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name Pat Rebujo							
Signature Pat Rebujo							
Month Day Year 10 11 10							

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number C A T 0 0 0 8 1 8 9 1 8		2. Page 1 of 1	3. Emergency Response Phone NRCES 510-740-1390		4. Manifest Tracking Number 005391876 JJK				
5. Generator's Name and Mailing Address OWENS ILLINOIS INC OAKLAND PLT 20 3800 ALAMEDA AVE OAKLAND CA 94601					Generator's Site Address (if different than mailing address) Att: BILL BOSCACCI						
Generator's Phone: 510 436-2166					U.S. EPA ID Number C A R 0 0 0 0 3 0 1 1 4						
6. Transporter 1 Company Name NRC ENVIRONMENTAL SERVICES INC.					U.S. EPA ID Number						
7. Transporter 2 Company Name					U.S. EPA ID Number						
8. Designated Facility Name and Site Address US ECOLOGY HIGHWAY 95, 18 MILES SOUTH OF LATHROP WEL BEATTY NV 89003					U.S. EPA ID Number N V T 3 3 0 0 1 0 0 0 0						
Facility's Phone: 800 239-3943											
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes		
					No.	Type					
	X	1. NA3077, Hazardous waste, solid, n.o.s. 9. PGIII			0 0 1	CM	12	Y	D006	D007	D008
									132		
14. Special Handling Instructions and Additional Information WEAR APPROPRIATE PERSONAL PROTECTIVE EQUIPMENT JOB#/PO#: 47494. EPA FILE#: 070148659-0 (EPS) NRCES 1605 FERRY POINT ALAMEDA, CA 94501. Rin #250											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Officer's Printed/Typed Name W L BOSCACCI					Signature W L Boscacci		Month Day Year 02/08/10				
TRANSPORTER INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____										
	Transporter signature (for exports only): _____										
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials										
	Transporter 1 Printed/Typed Name Paul Carnevali					Signature Paul Carnevali		Month Day Year 02/08/10			
	Transporter 2 Printed/Typed Name					Signature		Month Day Year			
DESIGNATED FACILITY	18. Discrepancy										
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection										
	Manifest Reference Number: _____										
	18b. Alternate Facility (or Generator) U.S. EPA ID Number										
	Facility's Phone: _____										
	18c. Signature of Alternate Facility (or Generator) Month Day Year										
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
1. H132			2.			3.			4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a											
Printed/Typed Name Pat Rebojido					Signature Pat Rebojido		Month Day Year 02/09/10				

DTSC. 01205-1408

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAT000618918		2. Page 1 of 1	3. Emergency Response Phone NRCES 510-749-1390		4. Manifest Tracking Number 003501963 JJK				
		5. Generator's Name and Mailing Address OWENS ILLINOIS INC OAKLAND PLT 20 3800 ALAMEDA AVE OAKLAND CA 94601		Generator's Site Address (if different than mailing address) At: BILL BOSCACCI							
Generator's Phone: 510 436-2166		6. Transporter 1 Company Name NRC ENVIRONMENTAL SERVICES INC.					U.S. EPA ID Number CAK000165274 CAK000000001				
7. Transporter 2 Company Name							U.S. EPA ID Number				
8. Designated Facility Name and Site Address US ECOLOGY HIGHWAY 95, 18 MILES SOUTH OF LATHROP WEL BEATTY NV 89003							U.S. EPA ID Number				
Facility's Phone: 800 239-3843							NVT330010000				
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	X	1. RO. HAZARDOUS WASTE, LIQUID, N.O.S., S. NA3082, PGIII (D006, D007, D008) (ELECTRO PARTICIPATOR EP SLURRY			001	CM	2500	G	D006	D007	D008
									132		
14. Special Handling Instructions and Additional Information WEAR APPROPRIATE PERSONAL PROTECTIVE EQUIPMENT JOB#/PO#: 47494 US ECOLOGY HS# 070148659-0 NRCES 1605 FERRY POINT ALAMEDA, CA 94501 Bin# V241											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Offetor's Printed/Typed Name WJ Boscacci					Signature WJ Boscacci			Month Day Year 11/19/10			
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____										
	Transporter signature (for exports only): _____										
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials										
	Transporter 1 Printed/Typed Name Bill Powell					Signature [Signature]			Month Day Year 01/19/10		
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name					Signature			Month Day Year		
	18. Discrepancy										
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection										
	Manifest Reference Number: _____										
	18b. Alternate Facility (or Generator) U.S. EPA ID Number										
Facility's Phone: _____											
18c. Signature of Alternate Facility (or Generator)								Month Day Year			
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
1. A152		2.		3.		4.					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a											
Printed/Typed Name HOOPER					Signature [Signature]			Month Day Year 01/20/10			

2009 Comprehensive Biennial Report

Report run on: December 8, 2010 - 3:28 PM

Version 5.0

User Selection Criteria

BR Cycle: 2009	Number of GM Forms: 25
Handler ID: CAT000618918	Number of WR Forms: 25
Included in National Report: Yes	GM and WR Form Sort Order: Descending Order by Waste Amount

Results:

Data meeting the criteria you selected follows.

Total Pages: 3

Report Description

This report is designed to provide all information from the Biennial Report forms in a concise manner. This report should be used after identifying facilities with potential problems using the Preliminary State Detail Analysis volume, the Preliminary TSD & LQG List volumes or the Top Generator/Manager/Shipper/Receiver List reports below. If the user is not interested in seeing GM or WR forms, 0 (zero) may be specified to omit this portion of the report. The user may restrict data to records that were actually included in the National Biennial RCRA Hazardous Waste Report.

Report Information

Name: b_comprehensive.rdf
Deployed: April 2003
Last Revised: June 2010
Contact: rcrainfo.help@epa.gov

2009 Comprehensive Biennial Report

Page 2

Report run on: December 8, 2010 - 3:28 PM

EPA ID: CAT000618918 Handler Included in National Report: Yes Sequence Number: 1 Submittal Source: Annual/Biennial Report updated with Notification

Site Name: OWENS BROCKWAY GLASS CONTAINERS

Activity Location: CALIFORNIA

Land Type: Private

Location Address: 3600 ALAMEDA AVENUE
OAKLAND, CA 94601
County: ALAMEDAMailing Address: 3600 ALAMEDA AVENUE
OAKLAND, CA 94601
UNITED STATESContact Person: BILL BOSCACCI
3600 ALAMEDA AVENUE
OAKLAND, CA 94601
UNITED STATES
Ph: (510) 436-2166, Fax: (510) 436-2032
BILL.BOSCACCI@O-I.COMCertifying Person: PLANT MANAGER LOREN JOHNSON
Signed: 02/18/2010Owner (current)
OWENS ILLINOIS
From: 01/01/1937ONE O-I PLAZA
ONE MICHAEL OWENS WAY
PERRYSBURG, OH 43551
PERRYSBURGType: Private
Phone: (567) 336-8682

Notes:

F

Operator (current)
OWENS ILLINOIS
From: 01/01/1937
Notes:

Type: Private

F

Notes:

Regulated Waste Activities

Hazardous Waste Generator Status

Federal: LARGE QUANTITY GENERATOR

State: LARGE QUANTITY GENERATOR

Exempt Boiler and/or Industrial Furnace

Importer Activity: ☐Mixed Waste Generator: ☐Transporter Activity: ☐Tsd Activity: ☐Recycler Activity: ☐

Other Hazardous Waste Generator Activities

Small Quantity Onsite Burner Exemption: ☐Smelting, Melting, Refining Furnace Exemption: ☐

EPA Waste Codes: D001 D006 D007 D008 D010 D035 F005

State Waste Codes: 135 181 214

Universal Waste

No Universal Waste Information

NAICS Codes: 327213 - GLASS CONTAINER MANUFACTURING

State Activity: No State Activity Information

Used Oil Activities

Used Oil Transporter Activity

Transfer Facility: ☐Transporter: ☐Used Oil Processor and/or
Re-refiner ActivityProcessor: ☐Refiner: ☐Underground Injection Control: ☐Off-Specification Used Oil Burner: ☐

Used Oil Fuel Marketer Activity

Marketer who first claims the used oil
meets the specifications: ☐Marketer who directs shipment
off-specification used oil to off-specification
used oil burner: ☐Destination Facility for Universal Waste: ☐

2009 Comprehensive Biennial Report

Page 3

Report run on: December 8, 2010 - 3:28 PM

EPA ID: CAT000618918 - OWENS BROCKWAY GLASS CONTAINERS (continued)

Form GM - Page: 1

ELECTROSTATIC PRECIPITATOR DUST

EPA Waste Codes: D006 D007 D008 D010

State Waste Codes: CA-181

Notes:

Source: HQ-G15-EQUIPMENT CHANGE

On-Site Process:

Form: HQ-W319-OTH INORGANIC SOLIDS

N
RCRA-radioactive Mixed: NO

Waste Minimization: Recycling on-site was implemented

Qty Generated (tons):	94.52	Qty Generated:	189,030.00	UOM:	HQ-POUNDS	Density:	0.00/ HQ-	Generation Included in NBR:	Yes
Off-Site Shipments:	EPA ID	Sequence Number	Quantity (tons)	Quantity	Management Method	Shipment Included in NBR			
	NVT330010000	1	27.15	54,290.00	H132 - LANDFILL OR SURFACE IMPOUNDMENT	Yes			
	CAT000646117	2	67.37	134,740.00	H132 - LANDFILL OR SURFACE IMPOUNDMENT	Yes			

Form GM - Page: 2

ELECTROSTATIC PRECIPITATOR RINSATE

EPA Waste Codes: D007 D008

State Waste Codes: CA-135

Notes: CLEANING OF AIR POLLUTION CONTROL EQUIPMENT

Source: HQ-G13-CLEANING EQUIPMENT

On-Site Process:

Form: HQ-W504-OTHER SLUDGES

N
RCRA-radioactive Mixed: NO

Waste Minimization: No waste minimization efforts were implemented

Qty Generated (tons):	27.90	Qty Generated:	55,800.00	UOM:	HQ-POUNDS	Density:	0.00/ HQ-	Generation Included in NBR:	Yes
Off-Site Shipments:	EPA ID	Sequence Number	Quantity (tons)	Quantity	Management Method	Shipment Included in NBR			
	CAD008488025	1	27.90	55,800.00	H121 - NEUTRALIZATION ONLY	Yes			

Form GM - Page: 3

IGNITABLE SPENT SOLVENT AND INK, MEK

EPA Waste Codes: D001 D035 F005

State Waste Codes: CA-214

Notes: CLEANING OF SPRAY HEADS

Source: HQ-G01-RINSING

On-Site Process:

Form: HQ-W209-PAINT, INK, ETC.

N
RCRA-radioactive Mixed: NO

Waste Minimization: No waste minimization efforts were implemented

Qty Generated (tons):	0.18	Qty Generated:	55.00	UOM:	HQ-GALLONS	Density:	6.70/ HQ-lbs/gal	Generation Included in NBR:	Yes
Off-Site Shipments:	EPA ID	Sequence Number	Quantity (tons)	Quantity	Management Method	Shipment Included in NBR			
	ARD981057870	1	0.18	55.00	H061 - FUEL BLENDING	Yes			

No Form WR Pages Submitted

* End of Report *

2007 Comprehensive Biennial Report

Report run on: December 8, 2010 - 5:17 PM

Version 5.0

User Selection Criteria

BR Cycle: 2007	Number of GM Forms: 25
Handler ID: CAT000618918	Number of WR Forms: 25
Included in National Report: Yes	GM and WR Form Sort Order: Descending Order by Waste Amount

Results:

Data meeting the criteria you selected follows.

Total Pages: 3

Report Description

This report is designed to provide all information from the Biennial Report forms in a concise manner. This report should be used after identifying facilities with potential problems using the Preliminary State Detail Analysis volume, the Preliminary TSD & LQG List volumes or the Top Generator/Manager/Shipper/Receiver List reports below. If the user is not interested in seeing GM or WR forms, 0 (zero) may be specified to omit this portion of the report. The user may restrict data to records that were actually included in the National Biennial RCRA Hazardous Waste Report.

Report Information

Name: b_comprehensive.rdf
Deployed: April 2003
Last Revised: June 2010
Contact: rcrainfo.help@epa.gov

2007 Comprehensive Biennial Report

Page 2

Report run on: December 8, 2010 - 5:17 PM

EPA ID: CAT000618918 **Handler Included in National Report:** Yes **Sequence Number:** 10 **Submission Source:** Annual/Biennial Report
Site Name: OWENS BROCKWAY GLASS CONTAINERS **Activity Location:** CALIFORNIA **Land Type:** Private
Location Address: 3600 ALAMEDA AVENUE **Mailing Address:** 3600 ALAMEDA AVENUE
OAKLAND, CA 94601 OAKLAND, CA 94601
County: ALAMEDA UNITED STATES

Contact Person: BILL L BOSCACCI
Ph: (510) 436-2166
BILL.BOSCACCI@US.O-I.COM

Certifying Person: PLANT MANAGER LOREN JOHNSON
Signed: 02/26/2008

Owner (current) ONE MICHAEL OWENS WAY Type: Private
OWENS ILLINOIS PERRYSBURG, OH 43551
From: 01/01/1937 PERRYSBURG
Notes: F

Operator (current) Type: Private
OWENS ILLINOIS
From: 01/01/1937
Notes: F
CA

Regulated Waste Activities

Hazardous Waste Generator Status

Federal: LARGE QUANTITY GENERATOR

State: LARGE QUANTITY GENERATOR

Exempt Boiler and/or Industrial Furnace

Importer Activity: ☐

Mixed Waste Generator: ☐

Transporter Activity: ☐

Tsd Activity: ☐

Recycler Activity: ☐

Other Hazardous Waste Generator Activities

Small Quantity Onsite Burner Exemption: ☐

Smelting, Melting, Refining Furnace Exemption: ☐

EPA Waste Codes: D001 D006 D007 D008 D010 D035 F003 F005

State Waste Codes: No State Waste Codes Found

Universal Waste

No Universal Waste Information

NAICS Codes: 327213 - GLASS CONTAINER MANUFACTURING

State Activity: No State Activity Information

Used Oil Activities

Used Oil Transporter Activity

Transfer Facility: ☐

Transporter: ☐

Used Oil Processor and/or
Re-refiner Activity

Processor: ☐

Refiner: ☐

Underground Injection Control: ☐

Off-Specification Used Oil Burner: ☐

Used Oil Fuel Marketer Activity

Marketer who first claims the used oil
meets the specifications: ☐

Marketer who directs shipment
off-specification used oil to off-specification
used oil burner: ☐

Destination Facility for Universal Waste: ☐

2007 Comprehensive Biennial Report

Page 3

Report run on: December 8, 2010 - 5:17 PM

EPA ID: CAT000618918 - OWENS BROCKWAY GLASS CONTAINERS (continued)

Form GM - Page: 1

REFRACTORY BRICK DERIVED FROM THE REPAIR OF A GLASS FURNACE, CONTAMINATED WITH HEAVY METALS

EPA Waste Codes: D007 D008 D010

State Waste Codes: No State Waste Codes Found

Notes: GLASS FURNACE RUBBLE.

Source: HQ-G15-EQUIPMENT CHANGE

Form: HQ-W319-OTH INORGANIC SOLIDS

RCRA-radioactive Mixed: NO

On-Site Process:

Waste Minimization: None

Qty Generated (tons):	154.73	Qty Generated:	309,460.00	UOM:	HQ-POUNDS	Density:	0.00/	Generation Included in NBR:	Yes
Off-Site Shipments:	EPA ID	Sequence Number	Quantity (tons)	Quantity	Management Method	Shipment Included in NBR			
	NVT330010000	1	154.73	309,460.00	H112 - MACRO-ENCAPSULATION	Yes			

Form GM - Page: 2

TOXIC FURNANCE DUST DERIVED FROM THE CLEANING OF REGENERATORS, CONTAINING HEAVY METALS

EPA Waste Codes: D006 D007 D008 D010

State Waste Codes: No State Waste Codes Found

Notes: REGENERATOR OR CHECKER DUST AND ELECTROSTATIC PRECIPITATOR DUST. +WM

Source: HQ-G13-CLEANING EQUIPMENT

Form: HQ-W319-OTH INORGANIC SOLIDS

RCRA-radioactive Mixed: NO

On-Site Process:

Waste Minimization: None

Qty Generated (tons):	14.84	Qty Generated:	29,680.00	UOM:	HQ-POUNDS	Density:	0.00/	Generation Included in NBR:	Yes
Off-Site Shipments:	EPA ID	Sequence Number	Quantity (tons)	Quantity	Management Method	Shipment Included in NBR			
	CAD009452657	2	10.00	20,000.00	H112 - MACRO-ENCAPSULATION	Yes			
	NVT330010000	1	4.84	9,680.00	H112 - MACRO-ENCAPSULATION	Yes			

Form GM - Page: 3

IGNITABLE SPENT SOLVENT AND INK FROM CLEANING SPRAY HEADS, MEK

EPA Waste Codes: D001 D035 F003 F005

State Waste Codes: No State Waste Codes Found

Notes: +WM

Source: HQ-G01-RINSING

Form: HQ-W209-PAINT, INK, ETC.

RCRA-radioactive Mixed: NO

On-Site Process:

Waste Minimization: None

Qty Generated (tons):	0.18	Qty Generated:	55.00	UOM:	HQ-GALLONS	Density:	6.70/ HQ-lbs/gal	Generation Included in NBR:	Yes
Off-Site Shipments:	EPA ID	Sequence Number	Quantity (tons)	Quantity	Management Method	Shipment Included in NBR			
	CAD009452657	1	0.18	55.00	H020 - SOLVENTS RECOVERY	Yes			

No Form WR Pages Submitted

* End of Report *



Evaluation List


**OWENS BROCKWAY GLASS
CONTAINERS**
OAKLAND
CAT000618918

EPA Unaddressed SNC: N	EPA Addressed SNC: N	EPA SNC with Compliance Schedule Established: N
State Unaddressed SNC: N	State Addressed SNC: N	State SNC with Compliance Schedule Established: N
Out of State SNC: N		

[Add New Evaluation](#) [Show All Violations](#)

4 Evaluation(s) found.

Page: 1	Go To <input type="text"/>
---------	----------------------------

Evaluations								Violations	
	Act Loc	Identifier ▲▼	Type ▲▼	▲ Date ▼	Agency	Resp Person	Evaluation Desc	Count	
1	CA	200	CEI	10/19/2004	S		COMPLIANCE EVALUATION INSPECTION ON-SITE	1	Show Violations
2	CA	001	CEI	02/25/2004	E	NRUMR	COMPLIANCE EVALUATION INSPECTION ON-SITE	1	Show Violations
3	CA	001	CEI	04/09/1998	E	CSEIT	COMPLIANCE EVALUATION INSPECTION ON-SITE	2	Show Violations
4	CA	001	CEI	04/13/1994	B	R9STA	COMPLIANCE EVALUATION INSPECTION ON-SITE	No violations found.	

URL: /rcrainfo/cme/cme_eval_list.jsp

OWENS-BROCKWAY

RCRA Code	Description	2002	2003	2004	2005	2006	2007	2008	2009	2010
	Blank/Unknown	213.0629	243.63758	22.1711	45.62698	36.11414	124.22158	35.4696	81.8601	36.253
	Blank/Unknown					2.30435				
D001	Ignitable	0.60465	0.8135	0.783	0.7715	0.108				
D002	Corrosives	0.45				0.0417				
D006	Cadmium			52.2112	72.9068	15.7704			47.1968	
D007	Chromium	25.284	160.132	281.856	1,622.75	0.8428			10.5	
D008	Lead	54.882	166.8744	16.856		15.1704	8.428	34.0564	64.9506	30.9636
D010	Selenium						137.6624	19.6814	10.1136	18.5416
D039	Tetrachloroethylene	0.22509	0.0834							
F002	Halogenated solvents									
F005	Non-halogenated solvents						0.1815	0.1815	0.198	
NONE	Blank/Unknown			12.97874	17.61976					
	TOTALS	294.50864	571.54088	386.85604	1,759.68	70.35179	270.49348	89.3889	214.8191	85.7582

DTSC.01130.2261

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAT0000818918		2. Page 1 of 1		3. Emergency Response Phone NRCS 510-749-1390		4. Manifest Tracking Number 005391677 JJK	
		5. Generator's Name and Mailing Address OWENS ILLINIOS INC OAKLAND PPT 20 3800 ALAMEDA AVE OAKLAND CA 94601 Generator's Phone: 510-438-2188						Generator's Site Address (if different than mailing address)	
GENERATOR		6. Transporter 1 Company Name NRC ENVIRONMENTAL SERVICES INC.						U.S. EPA ID Number CAR000030114	
		7. Transporter 2 Company Name						U.S. EPA ID Number	
DESIGNATED FACILITY		8. Designated Facility Name and Site Address Chemical Waste Management-KHF 35251 Old Skyline Rd Kettleman Hills CA 93239 Facility's Phone: 559-980-0101						U.S. EPA ID Number CAT0000848117	
		9a. HM X						9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) RQ NA3077 HAZARDOUS WASTE SOLID, N.O.S. (CHECKER DUST WITH CADMIUM) 9, PGIII (D006) (PROFILE# CA570986)	
TRANSPORTER		11. Total Quantity 18						12. Unit Wt./Vol. y	
		13. Waste Codes 181 D006							
INTL		14. Special Handling Instructions and Additional Information WEAR APPROPRIATE PERSONAL PROTECTIVE EQUIPMENT JOB#/PO#: 45069 PROFILE#: CA579986 NRCS 1605 FERRY POINT ALAMEDA, CA 94501 Birth# 3248							
		15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
		Generator's/Offoror's Printed/Typed Name W. L. Boscarelli							
		Signature W. L. Boscarelli Month Day Year 10/30/09							
TRANSPORTER		16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/ext: Date leaving U.S.:							
		17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name John Carzonieri Signature John Carzonieri Month Day Year 10/30/09							
		Transporter 2 Printed/Typed Name Signature Month Day Year							
		18. Discrepancy							
DESIGNATED FACILITY		18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number:							
		18b. Alternate Facility (or Generator) U.S. EPA ID Number							
		Facility's Phone:							
		18c. Signature of Alternate Facility (or Generator) Month Day Year							
DESIGNATED FACILITY		19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H132 2. 3. 4.							
		20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 19a Printed/Typed Name Ginger Adams Signature Ginger Adams Month Day Year 10/30/09							
		DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)							

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number C A T 0 0 0 6 1 8 9 1 8		2. Page 1 of 1	3. Emergency Response Phone NRCS 510-749-1390		4. Manifest Tracking Number 005391678 JJK			
		5. Generator's Name and Mailing Address OWENS ILLINOIS INC OAKLAND PPT 20 3800 ALAMEDA AVE OAKLAND CA 94601		At: BILL BOSCACCI		Generator's Site Address (if different than mailing address)				
Generator's Phone: 5 1 0 4 3 8 - 2 1 8 8		6. Transporter 1 Company Name NRC ENVIRONMENTAL SERVICES INC.					U.S. EPA ID Number C A R 0 0 0 0 3 0 1 1 4			
7. Transporter 2 Company Name							U.S. EPA ID Number			
8. Designated Facility Name and Site Address Chemical Waste Management-KHF 35251 Old Skyline Rd Kettleman Hills CA 93239							U.S. EPA ID Number			
Facility's Phone: 559 386-6161		C A T 0 0 0 6 4 8 1 1 7								
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
	X	1RQ NA3077 HAZARDOUS WASTE SOLID, N.O.S. (CHECKER DUST WITH CADMIUM) 9, PGIII (D006) (PROFILE# CA579980)			0 0 1 CM		2 0	Y	181	D006
14. Special Handling Instructions and Additional Information WEAR APPROPRIATE PERSONAL PROTECTIVE EQUIPMENT JOB#/PO#: 45069 PROFILE#: CA579986 NRCS 1605 FERRY POINT ALAMEDA, CA 94501 Bin # 3193										
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
Generator's/Offor's Printed/Typed Name W L Boscacci					Signature <i>W L Boscacci</i>		Month Day Year 10 30 09			
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____									
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name PACI CARREANO Signature <i>Paci Carreano</i> Month Day Year 10 30 09 Transporter 2 Printed/Typed Name _____ Signature _____ Month Day Year _____									
DESIGNATED FACILITY	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____									
	18b. Alternate Facility (or Generator) U.S. EPA ID Number _____									
	Facility's Phone: _____									
	18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____									
19. Hazardous Waste Report Management Method Code's (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H132 2. _____ 3. _____ 4. _____										
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Printed/Typed Name Ginger Adams Signature <i>Ginger Adams</i> Month Day Year 10 30 09										

910 30272

DTSC. 01130. 2344

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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAT000818918	2. Page 1 of 1	3. Emergency Response Phone NRCS 510-749-1390	4. Manifest Tracking Number 005391681 JJK		
5. Generator's Name and Mailing Address OWENS ILLINOIS INC OAKLAND PPT 20 3600 ALAMEDA AVE OAKLAND CA 94601 Generator's Phone: 510 498-2100		At: BILL BOSCACCI		Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name NRC ENVIRONMENTAL SERVICES INC.		U.S. EPA ID Number CAR000030114					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address Chemical Waste Management-KHF 35251 Old Skyline Rd Kettleman Hills CA 93239 Facility's Phone: 559 398-8484		U.S. EPA ID Number		CAT000848417			
GENERATOR	9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. RQ NA3077 HAZARDOUS WASTE SOLID, N.O.S. (CHECKER DUST WITH CADMIUM) 9, PGIII (D008) (PROFILE# CA579986)	0 0 1 CM		18	Y	181 D008
		2.					
		3.					
		4.					
14. Special Handling Instructions and Additional Information WEAR APPROPRIATE PERSONAL PROTECTIVE EQUIPMENT JOB#/PO#: 45069 PROFILE#: CA579986 NRCS 1605 FERRY POINT ALAMEDA, CA 94501 B.W.# 3137							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name W.L. BOSCACCI		Signature W.L. BOSCACCI		Month Day Year 10/28/07			
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:				
	Transporter signature (for exports only):						
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name Paul Canedo		Signature Paul Canedo		Month Day Year 10/29/07		
TRANSPORTER	Transporter 2 Printed/Typed Name		Signature		Month Day Year		
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number:						
	18b. Alternate Facility (or Generator) U.S. EPA ID Number						
	Facility's Phone:						
DESIGNATED FACILITY	18c. Signature of Alternate Facility (or Generator) Month Day Year						
DESIGNATED FACILITY	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
	1. H132 2. 3. 4.						
DESIGNATED FACILITY	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
	Printed/Typed Name Ginger Delans		Signature Ginger Delans		Month Day Year 10/29/07		

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAT000618918	2. Page 1 of 1	3. Emergency Response Phone (800) 368-4778	4. Manifest Tracking Number 005543987 JJK
5. Generator's Name and Mailing Address OWENS ILLINOIS INC PLANT 20 - OAKLAND 3800 ALAMEDA AVENUE OAKLAND CA 94604 Generator's Phone: 510 436-2165		Generator's Site Address (if different than mailing address) 3800 ALAMEDA AVENUE OAKLAND CA 94604			
6. Transporter 1 Company Name ENVIRONMENTAL RECOVERY SERVICES, INC.		U.S. EPA ID Number CAR000188201			
7. Transporter 2 Company Name		U.S. EPA ID Number			
8. Designated Facility Name and Site Address PHIBRO TECH 8851 DICE ROAD SANTA FE SPRINGS CA 90670 Facility's Phone: (562) 898-8058		U.S. EPA ID Number CAD008488020			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt/Vol
X	1. HAZARDOUS WASTE LIQUID, N.O.S. 9, NA3082, PGII (CHROMIUM, LEAD)	1	TT	1500	G
	2.				
	3.				
	4.				
13. Waste Codes 0007 0009 138					
14. Special Handling Instructions and Additional Information 9811 20082P - EEP WATER ENG: 281, 171 - ERS W063028 - LQ BILL TO ENV RECOVERY - WEAR PROPER PPE					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Officer's Printed/Typed Name W. L. Boscarci		Signature <i>W. L. Boscarci</i>		Month Day Year 01 07 09	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.: Transporter signature (for exports only):					
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: PATRICK GAINES Signature: <i>P. Gaines</i> Month Day Year: 01 07 09 Transporter 2 Printed/Typed Name: Signature: Month Day Year:					
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: 18b. Alternate Facility (or Generator) U.S. EPA ID Number: Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month Day Year:					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 2. 3. 4.					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Printed/Typed Name: Signature: Month Day Year:					

(m) For all variances, the petitioner must also demonstrate that compliance with any given treatment variance is sufficient to minimize threats to human health and the environment posed by land disposal of the waste. In evaluating this demonstration, EPA may take into account whether a treatment variance should be approved if the subject waste is to be used in a manner constituting land disposal pursuant to 40 CFR 266.20 through 266.23.

(n) [Reserved]

(o) The following facilities are excluded from the treatment standards under § 268.40 and are subject to the following conditions:

TABLE—WASTES EXCLUDED FROM THE TREATMENT STANDARDS UNDER § 268.40

Facility name ¹ and address	Waste code	See also	Regulated hazardous constituent	Wastewaters		Nonwastewaters	
				Concentration (mg/L)	Notes	Concentration (mg/kg)	Notes
Ball-Foster Glass Container Corporation, El Monte, CA ^{(6),(7)}	D010	Table CCWE in 268.40	Selenium	NA	NA	25	NA
Craftsman Plating and Tinning, Corp., Chicago, IL	F006	Table CCWE in 268.40	Cyanides (Total)	1.2	(²)	1800	(²)
			Cyanides (Amenable)	.86	(² and ³)	30	(²)
			Cadmium	1.6	(²)	NA	(²)
			Chromium	.32	(²)	NA	(²)
			Lead	.040	(²)	NA	(²)
			Nickel	.44	(²)	NA	(²)
Northwestern Plating Works, Inc., Chicago, IL	F006	Table CCWE in 268.40	Cyanides (Total)	1.2	(² and ³)	970	(²)
			Cyanides (Amenable)	.86	(²)	30	(²)
			Cadmium	1.6	(²)	NA	(²)
			Chromium	.32	(²)	NA	(²)
			Lead	.040	(²)	NA	(²)
			Nickel	.44	(²)	NA	(²)
Owens Brockway Glass Container Company, Vernon, CA ^{(6),(7)}	D010	Table CCWE in 268.40	Selenium	NA	NA	51	NA

⁽¹⁾A facility may certify compliance with these treatment standards according to provisions in 40 CFR 268.7.

⁽²⁾Cyanide Wastewater Standards for F006 are based on analysis of composite samples.

⁽³⁾These facilities must comply with 0.86 mg/L for amenable cyanides in the wastewater exiting the alkaline chlorination system. These facilities must also comply with 40 CFR § 268.7.a.4 for appropriate monitoring frequency consistent with the facilities' waste analysis plan.

⁽⁴⁾Cyanide nonwastewaters are analyzed using SW-846 Method 9010 or 9012, sample size 10 grams, distillation time, 1 hour and 15 minutes.

⁽⁵⁾Alternative D010 selenium standard only applies to dry scrubber solid from glass manufacturing wastes.

⁽⁶⁾Alternative D010 selenium standard only applies to electrostatic precipitator dust generated during glass manufacturing operations.

⁽⁷⁾D010 wastes generated by these two facilities are subject to the following conditions: (a) the wastes must be treated by Chemical Waste Management, Inc. at their Kettleman Hills facility in Kettleman City, California; and (b) this treatment variance will be valid until May 11, 2002.

NOTE: NA means Not Applicable.

[51 FR 40642, Nov. 7, 1986; 52 FR 21017, June 4, 1987 as amended at 53 FR 31221, Aug. 17, 1988; 54 FR 36077, Sept. 6, 1989; 56 FR 12355, Mar. 25, 1991]

Treatment standards for hazardous debris.

Hazardous debris must be treated prior to land disposal as follows unless EPA determines that the debris is no longer contaminated with hazardous waste or the debris is treated to a standard provided in this subpart for the waste contaminating the debris:

Hazardous debris must be treated for each "contaminant subject to treatment" defined by paragraph (b) of this section using the technology or technologies identified in Table 1 of this section.

Characteristic debris. Hazardous debris that exhibits the characteristic of ignitability, corrosivity, or reactivity as defined in §§ 261.21, 261.22, and 261.23 of this chapter, respectively, must be deactivated by treatment using one of the technologies identified in Table 1 of this section.

Mixtures of debris types. The treatment standards of Table 1 in this section must be achieved for each type of debris in a mixture of debris types. If an immobilization technology is used in a treatment train, it must be the last technology used.

Mixtures of contaminant types. Debris that is contaminated with two or more contaminants subject to treatment under paragraph (b) of this section must be treated for each contaminant using one or more treatment technologies identified in Table 1 of this section. If an immobilization technology is used in a treatment train, it must be the last technology used.

Waste PCBs. Hazardous debris that is also a waste PCB under 40 CFR Part 761 is subject to the requirements of 40 CFR Part 761 or the requirements of this section, whichever are more stringent.

Contaminants subject to treatment. Hazardous debris must be treated for each "contaminant subject to treatment" as defined in paragraph (b) of this section. The contaminants subject to treatment must be determined as follows:

(1) **Toxicity characteristic debris.** The contaminants subject to treatment for debris that exhibits the Toxicity Characteristic (TC) by § 261.24 of this chapter are those EP constituents for which the debris exhibits the TC toxicity characteristic.

(2) **Debris contaminated with listed waste.** The contaminants subject to treatment for debris that is contaminated with a listed hazardous waste are those constituents or wastes for which treatment standards are established for under § 268.40.

(3) **Cyanide reactive debris.** Hazardous debris that is reactive because of cyanide must be treated for cyanide.

(4) **Conditioned exclusion of treated debris.** Hazardous debris that has been treated using one of the specified extraction technologies in Table 1 of this section and that does not exhibit a characteristic of hazardous waste identified under Part 261, of this chapter after treatment is not a hazardous waste and need not be managed in a subtitle C facility. Hazardous debris contaminated with a listed waste that is treated by an immobilization technology specified in Table 1 is a hazardous waste and must be managed in a subtitle C facility.

RCRA-501 RDB-6477

(4) **Treatment residuals—(1) General requirements.** Except as provided by paragraphs (d)(2) and (d)(4) of this section:

(i) Residue from the treatment of hazardous debris must be separated from the treated debris using simple mechanical means; and

(ii) Residue from the treatment of hazardous debris is subject to the waste-specific treatment standards of Subpart D of this part for the waste contaminating the debris.

(2) **Nontoxic debris.** Residue from the deactivation of ignitable, corrosive, or reactive characteristic hazardous debris (cyanide-reactive) that is not contaminated with a contaminant subject to treatment defined by paragraph (b) of this section must be deactivated prior to land disposal and is not subject to the waste-specific treatment standards of Subpart D of this part.

(3) **Cyanide-reactive debris.** Residue from the treatment of debris that is reactive because of cyanide must meet the treatment standards for D003 in "Treatment Standards for Hazardous Wastes" at § 268.40.

(4) **Ignitable nonwastewater residue.** Ignitable nonwastewater residue containing equal to or greater than 1 percent of the following: D001, Ignitable Liquids.

November 23, 2010

Got a phone message from Leroy Griffin of the Alameda County CUPA ((510) 755-5785) concerning the upcoming Owens-Brockway inspection. I sent him the following email (lgriffin@oaklandnet.com):

Leroy,

Thanks for, your phone message. The Owens-Brockway facility is scheduled to be inspected on Thursday, December 9. Hopefully, we can talk before then to set up the logistics. I will be accompanied by another EPA inspector, Amy Miller. Could we meet you at the facility itself at 8:00 am? Usually when I'm meeting a CUPA representative at a jobsite, I try to find the nearest Starbucks to meet, so that whoever arrives first has a comfortable place to wait for the other inspector. If you're okay with that, it looks like the Starbucks nearest to the facility is located at 3060A E 9th St., Oakland.

Between now and the inspection, would it be possible to look at prior inspection reports and the business plan for the facility?

TS-21

- Open used oil containers properly labeled. - reusing oil

22

- Oil waste label

- ~~adding oil~~

23-24

- Oil Rags bin labeled while there

25-26

- 55 gallon drums - oil

27-28

- Swab heads - DIE AREA

29-30

- used gloves + other

31-34

- ditto above. trash can

35-36

- SAA ^{Selected} maintenance area, close up of labels

37-38

MEK 10/18/10 ASD

39-41

containers unlabeled on top

42-44

MEK tags 12/5/2005

45-47

swaps tags as appropriate with

48-50

- Universal Waste + CRTS

90 DAY STORAGE AREA

42-44

- 1-55 gallon - open oil (no date)

45-47

- Bin old waste 10/13/10

48-50

- Rest of containers were empty.

- Overview - Brockway
- Only 7 DEGRS 7 main waste
 - GRT BEAST
 - CLASS MANUFACTURE
 - WYOMING BOSSACCI - ENVIRONMENTAL
 - AIR DISTRICT INSPECTORS
 - 2- EEDRS
1. Used Oil + Lubricant - product
 2. Labels for used oil ASD
 3. Overview of fuel - 1,200 gallons
 4. Used oil label on tank
 5. Label for cadmium + Chromium
 6. Overview sheet of Roll-off 15 yrd
 7. Label on roll-off fixed w/ ASD 11/8/10
 8. Bldg Dust used on-site (recycled)
 9. 55 gallon mixed waste w/ mixing
 10. 1' another container
 11. Overview of 2- 55 gallon drum
 12. EEDRS
 13. Used oil label + in basement
 14. Up close of HGT waste label used oil
 15. Top of old container open
 16. 17. - Beast SEIT - properly label container + close top of label
- Scale 1/4" Grid



May 22, 2004

Nancy Rumrill
Enforcement Officer
Environmental Protection Agency
WST-3
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Rumrill,


This letter is intended to respond to your warning letter dated May 3, 2004 in which you are requiring Owens to correct three areas of noncompliance and submit the documentation of their correction to U.S. EPA.

The three requested items of information are:

1. Photograph showing that the spent solvent accumulated in one liter containers for cleaning ink heads are properly labeled, pursuant to 22 CCR § 66262.34(e).
2. A written description of training provided to hazardous waste handlers that includes their specific emergency procedures (e.g., containment and/or cleanup of spills), pursuant to 22 CCR § 66265.16(a)(2).
3. Provide a description and certification of compliance related to our recycling of Electrostatic Precipitator (EP) dust and glass bead blast with California Health and Safety Code Section 25143.9.

The attachments that follow provide you with the requested information. I certify that these corrections have been completed as illustrated by the attachments. If you require additional information about the contents of this letter please contact Bill Boscacci at (510) 436-2166.

Sincerely,


Dwayne Wendler
Plant Manager

Re: EPA ID. No. CAT000618918

Certified Mail 7099 3220 0004 0214 4032

Packaging Solutions - Everywhere, Everyday

3600 Alameda Ave. • Oakland, CA 94601 • Tel: 510-436-2000 • Fax: 510-436-2076

Attachment 1

Photograph of spent solvent container



Attachment 2

Waste Handlers Training Description

Hazard Communication Standard

Ensures that employees are aware of the hazards of chemicals they work with and understand their rights under the standard.

Summary of Requirements

1. Inventory of all chemicals
2. Material Safety Data Sheets for all chemicals
3. Written program
4. Labeling
5. Training

Written Program contains:

- a) Name of person responsible for program
- b) Name of those responsible for employee information & training, MSDS files, labeling procedures, etc.
- c) Method of determining whether a chemical is hazardous
- d) Copy of current inventory and where hazardous materials are located.
- e) Methods used to comply with labeling requirements, MSDS files, employee information & training, Proposition 65 warnings.
- f) Method for informing employees of hazards of non-routine tasks and working on unlabeled pipes.
- g) Method of informing contractors of our chemicals & of them informing us of what they have
- h) Location of MSDS's & how employees can obtain copies.
- i) What to do in an emergency

Labeling:

They understand the use of HMIS labeling and hazardous waste labels.

Training:

All personnel will be trained at the time of initial assignment, when changes in job duties require additional training, or when procedures are changed.

Personnel Protective Equipment (PPE) and Hearing Protection

Emergency Evacuation and Spill Response

This is described in the following sections.

Respiratory Training (If Required)

Hazardous Waste Management.

This is described in the following sections.

Asbestos Awareness Training

Employees know where asbestos is located in their workplace.

They understand their limitations under the training and company policy.

- Comprehensive Spill Training -

- Specific "Materials of Concern" in O-B glass facility
- General Principles of "Materials of Concern"
- Best Management Practices
- Applicable Spill Related Plans
- NAERG 2000
- Prepare To Respond - Video ~ 18 min
- O-B Spill Contingency Plan
- Emergency Response 1-2-3

- Comprehensive Spill Training -

"MATERIALS OF CONCERN"
Anhydrous Ammonia - <i>hot end coating (HEC)</i>
Anhydrous Tin Tetrachloride - <i>hot end coating (HEC)</i>
Methyl Ethyl Ketone - <i>bottle coding</i>
Sulfuric Acid - <i>water treatment</i>
Muriatic Acid - <i>demineralizer regenerant</i>
Propane - <i>mobile equipment</i>
"Caustic" Materials - <i>water treatment, degreasing</i>
Safety-Kleen Parts Washers - <i>cleaning / degreasing</i>
Gasoline / Kerosene / "Oils" - <i>fuels, lubricants, etc.</i>
Checker Dust - <i>checker cleaning</i>
Tin Reclaimable Material - <i>HEC abatement system</i>
Oxygen - <i>supports combustion</i>

- Comprehensive Spill Training -

- General Principles of "Materials of Concern"
These materials may exhibit a physical and/or health (biological) hazard.
- **Physical** hazards : act indirectly to cause harm; include fires or explosions or other effects by mechanical means. Gasoline is a good example - classified as a flammable liquid, it is both a fire hazard and an explosive hazard. Even the vapors can be explosive.
- Other examples include oils, compressed gases, cryogenic liquids, and oxidizers.

- Comprehensive Spill Training -

- **Health (biological)** hazards: act directly to cause harm; if these materials contact your body directly, they cause biological reactions, destroying tissue or make you ill. The response or adverse reaction may be immediate (acute) or delayed (chronic).
- Most common examples include categories of materials defined as poisons, irritants, allergens, carcinogens, mutagens, and teratogens) and corrosives (such as acids, bases, caustics, alkalis).

- Comprehensive Spill Training -

"MATERIALS OF CONCERN"	HAZARD TYPE (H = health P = physical)
Anhydrous Ammonia	H - acute
Anhydrous Tin Tetrachloride	H - acute
Methyl Ethyl Ketone (MEK)	H - acute/chronic + P
Sulfuric Acid	H - acute/chronic
Muriatic Acid	H - acute
Propane	H - acute + P
"Caustic" Materials	H - acute
Safety Kleen Parts Washer	H - acute/chronic
Gasoline / Kerosene / "Oils"	H - acute/chronic + P
Checker Dust	H - chronic
Tin Reclaimable Material	H - acute
Oxygen	H - acute + P

- **Comprehensive Spill Training** -

- Best Management Practices:
 - Good housekeeping
 - Timely and appropriate spill report / response
 - Utilize inside or covered storage areas
 - Store materials in low traffic areas, away from drains, in areas that provide secondary containment controls
 - Routinely inspect potential storm water impact and spill areas
 - Dispose of obsolete equipment
 - Follow proper material management practices
 - Insure that all secondary containment valves are locked in a closed position, allowing only authorized access - visually observe and document release of accumulated stormwater.

- Comprehensive Spill Training -

- Applicable Spill Related Plans:
 - Storm Water Pollution Prevention Plan
 - Identifies areas with the potential to pollute storm water
 - Spill response procedure
 - Good Housekeeping Measures
 - Material Management Practices
 - Best Management Practices
 - Monthly / Quarterly / Semi - Annual / Annual Evaluations

- Comprehensive Spill Training -

- Applicable Spill Related Plans:
 - Spill Prevention Control and Countermeasure Plan
 - Written description of spill events and corrective action taken
 - Appropriate containment and/or diversionary structures or equipment to prevent discharged oil from reaching navigable waterways
 - A written commitment of manpower, equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged
 - Spill response internal / external notification procedure

- Comprehensive Spill Training -

- North American Emergency Response Guide (NAERG 2000)
 - contains placard table
 - lists DOT hazardous materials by 4 digit UN number (yellow pages) that will cross reference an emergency response guide
 - lists DOT hazardous materials in alphabetical order (blue pages) that will cross reference an emergency response guide
 - contains response guides that will summarize hazards and emergency action measures (orange pages)
 - provides initial isolation and protective distances (green pages) by UN number

- Comprehensive Spill Training -

"MATERIALS OF CONCERN"	NAERG NUMBER
Anhydrous Ammonia	125 (Gases - Corrosive)
Anhydrous Tin Tetrachloride	137 (Water Reactive - Corrosive)
Methyl Ethyl Ketone (MEK)	127 (Flammable Liquids)
Sulfuric Acid	137 (Water Reactive - Corrosive)
Muriatic Acid	157 (Toxic +/- Corrosive)
Propane	115 (Gases - Flammable)
"Caustic Materials"	154 (Toxic +/- Corrosive)
Safety-Kleen Parts Washers	128 (Flammable Liquids)
Gasoline / Kerosene / "Oils"	128 (Flammable Liquids)
Checker Dust	171 (Low to Moderate Hazard)
Tin Reclaimable Material	154 (Toxic +/- Corrosive)
Oxygen	122 (Gases - Oxidizing)

PREPARE TO RESPOND VIDEO

11

- Comprehensive Spill Training -

- O-B Spill Contingency Plan:

If a release is detected, the employee should implement the following:

- Attempt to identify the source of the leak and stop it, if you can do it without risk.
- Notify Forming Dept. Shift Foreman
- Shift Foreman will evacuate and contact local rescue service, if necessary.
- Depending on severity of the situation, the Shift Foreman should immediately notify Emergency Coordinator of the spill/release situation.

- Comprehensive Spill Training -

- Emergency Coordinator will assess the spill/release and determine if can handle internally or need outside assistance.
- Emergency Coordinator will communicate any spill situation to the appropriate authorities, after consulting with O-B Environmental Affairs.

- Emergency Response 1-2-3

Any of the following would be considered to be "emergency" situations..

1 - The immediate area needs to be evacuated - is the release forcing workers out of the area?

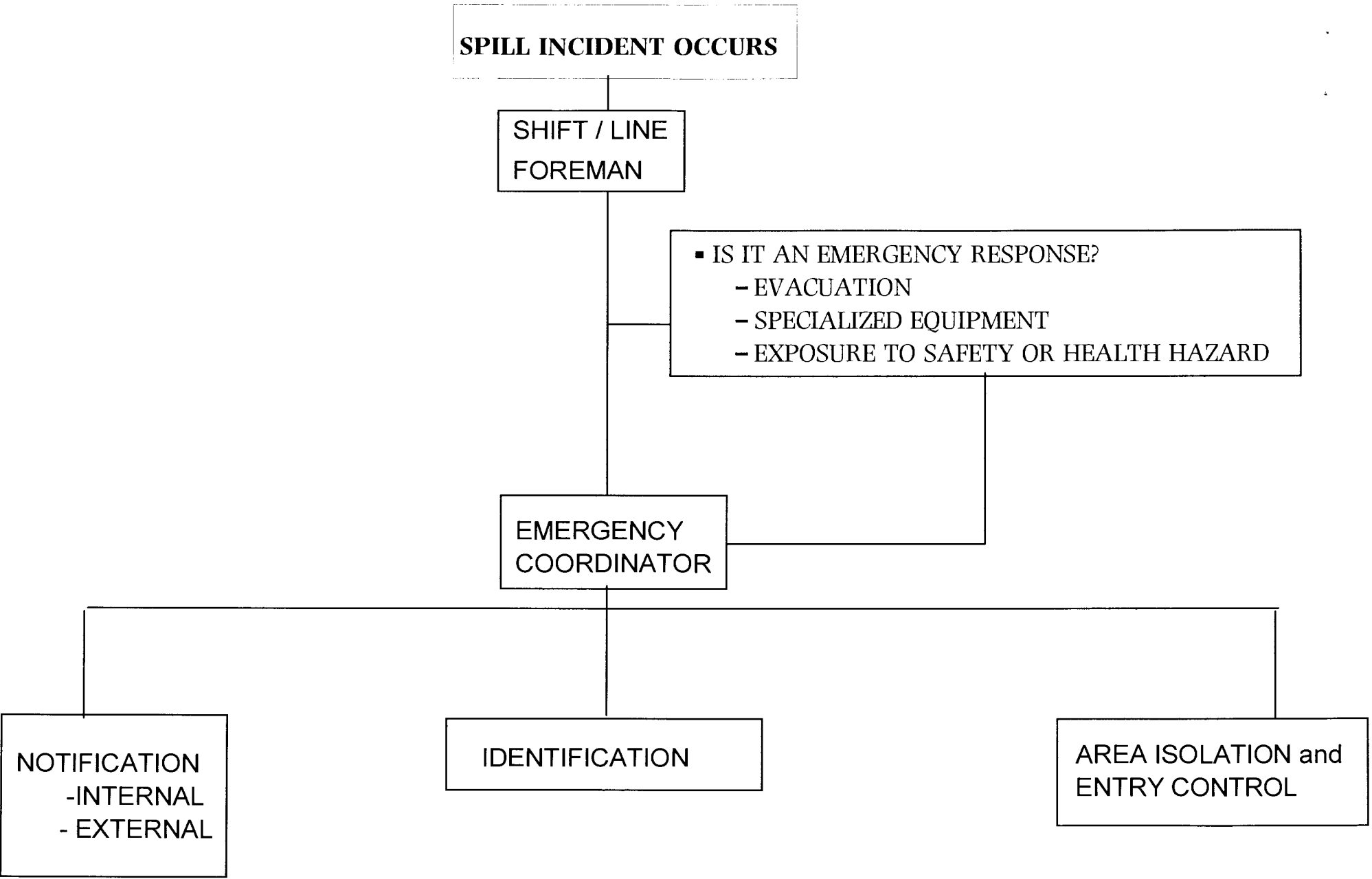
2 - Is the required level of PPE exceed the level that is provided to the employee for normal handling?

3 - Is there a potential / probable risk to health and safety?

If one or more of the conditions listed above is present - an emergency response situation exists.

Assessment of hazardous conditions and substances is a case-by-case requirement when determining the potential for an emergency situation.

14



IDENTIFICATION

- INITIAL MITIGATION
 - - COVER, TARP
 - - NEUTRALIZE (Immediate, small spill)
 - - SORB

CONTAINMENT

- DAM
- DIKE
- DIVERT

LEAK STOPPAGE

- PATCH
- PLUG
- TIGHTEN CONNECTIONS
- TRANSFER CONTENTS
- OVERPACK

CLEAN UP

- PLANT EMPLOYEES
- CONTRACTOR

US WASTE ENT

le - Video ~ 20 min
as Waste, Generation
Hazardous Waste

ating Points
criptions

edure

e Mistakes

HAZARDOUS WASTE MANAGEMENT

- Hazardous Waste Life Cycle - Video ~ 20 min
 - Definition of Hazardous Waste, Generation
- Owens-Brockway Specific Hazardous Waste Streams
 - Seven Common Generating Points
- Hazardous Waste Job Descriptions
- Spill Contingency Plan
 - O-B Notification Procedure
- Top Ten Hazardous Waste Mistakes

HAZARDOUS WASTE MANAGEMENT

HAZARDOUS WASTE LIFE CYCLE - VIDEO

HAZARDOUS WASTE MANAGEMENT

Owens-Brockway Specific Hazardous Waste Streams:

- Safety-Kleen Parts Washers
- Caustic Degreaser Tanks
- Image / Video Jet Printing Waste
- Solvent Rags
- SFL Spray Booth
- EP Dust / Glass Bead Blast
- Old, Outdated Chemicals

HAZARDOUS WASTE MANAGEMENT

- Hazardous Waste Management Positions
 - Job Titles
 - Hazardous Waste Accumulator
 - Hazardous Waste Coordinator
 - Hazardous Waste Inspector

HAZARDOUS WASTE MANAGEMENT

- Hazardous Waste Accumulator
 - Duties (IMAJE Ink Jet Coders - Satellite)
 - Wash heads per specification as necessary
 - Accumulate waste liquid MEK in appropriate container
 - Ensure that accumulation drums are labeled and labels visible
 - Ensure that accumulation drums are closed at all times except when adding or removing waste
 - General housekeeping

HAZARDOUS WASTE MANAGEMENT

- Hazardous Waste Accumulator
 - Duties (Satellite / Main)
- Accumulate waste in appropriate container
- Ensure that accumulation drums are labeled and labels visible
- Ensure that accumulation drums are closed at all times except when adding or removing waste
- Ensure that accumulation start date is on container (for non-satellite areas)
- General housekeeping

HAZARDOUS WASTE MANAGEMENT

- Hazardous Waste Coordinator
 - Duties
 - Provide proper storage area for 90-day storage of full hazardous waste drums
 - Provide proper hazardous waste labels and properly affix to waste container
 - Provide necessary manifest and LDR
 - Ensure containers are properly closed and lids secured
 - Follow up to ensure that return copy of signed manifest is received within 35 days

HAZARDOUS WASTE MANAGEMENT

- Hazardous Waste Inspector
 - Duties (Inspect and record:)
 - If materials are stored in designated areas
 - Evidence of container leakage
 - Spillage in loading/unloading areas
 - Integrity of containment systems
 - Storage containers properly labeled and dated
 - Waste accumulation does not exceed 90 days
 - Condition of waste oil accumulation areas

HAZARDOUS WASTE MANAGEMENT

- Hazardous Waste Inspector (continued)
 - Duties (Inspect and record:)
 - Adequate emergency response equipment
 - Condition of emergency response equip
 - Integrity of housekeeping measures at storage areas

Inspections will be conducted weekly. Any unsafe, unusual, or improprieties will be verbally communicated to the SPCCP Coordinator. All inspections will be documented.

HAZARDOUS WASTE MANAGEMENT

Spill Contingency Plan :

If a release is detected, the employee should implement the following:

- Attempt to identify the source of the leak and stop it, if you can do it without risk.
- Notify Shift Foreman (hot end or cold end)
- Shift Foreman will evacuate and contact local rescue service, if necessary.
- Depending on severity of the situation, the Shift Foreman should immediately notify SPCCP Coordinator of the spill/release situation.

HAZARDOUS WASTE MANAGEMENT

- SPCCP Coordinator will assess the spill/release and determine if can handle internally or need outside assistance.
- SPCCP Coordinator will communicate any spill situation to the appropriate authorities, after consulting with O-B Environmental Affairs.

HAZARDOUS WASTE MANAGEMENT

- **TEN TOP HAZARDOUS WASTE MISTAKES**
- ✓ 10 Misclassifying non-hazardous waste as hazardous (costs money), or hazardous waste as non-hazardous (risks penalties)

HAZARDOUS WASTE MANAGEMENT

■ **TEN TOP HAZARDOUS WASTE MISTAKES**

- ✓ 10 Misclassifying non-hazardous waste as hazardous (costs money), or hazardous waste as non-hazardous (risks penalties)
- ✓ 9 Accumulating waste over 90 days for LQG or 180 days for SQG

HAZARDOUS WASTE MANAGEMENT

■ **TEN TOP HAZARDOUS WASTE MISTAKES**

- ✓ 10 Misclassifying non-hazardous waste as hazardous (costs money), or hazardous waste as non-hazardous (risks penalties)
- ✓ 9 Accumulating waste over 90 days for LQG or 180 days for SQG
- ✓ 8 Accumulating too much waste at satellite accumulation points. 55 gal. is the limit

**WHY THESE INSTRUCTIONS MUST BE
FOLLOWED PRECISELY**

1. How this waste must be handled is precisely specified by State and Federal regulations. **IT IS THE LAW !!**
2. Proper waste management keeps you and your fellow workers safe.
3. Failure to follow good practices can result in stiff fines.
4. Internal inspections are being performed and documented.
5. Prompt action must be taken to correct noted deficiencies.
6. Following the specified practices is not optional. They must be followed precisely and they must be correct all the time. **It is O-I policy and it is the law!!**
7. O-I is committed to full compliance with environmental laws and regulations.
8. O-I management expects you do your part to be sure it is right.

**TRAINING THAT IS COVERED BY THE
INTERACTIVE LEARNING CENTER AND BY THE
CORPORATE HEALTH AND SAFETY DEPARTMENT**

1. Hazard Communication (including MSDS training)
2. Personnel Protective Equipment (PPE) and Hearing Protection
3. Emergency Evacuation and Spill Response
4. Respiratory Training (If Required)
5. Hazardous Waste Management.
6. Make sure that all of your employees are up to date on Items 1, 2, 3, 4, and 5. This includes records that prove training was successfully completed. The Environmental Supervisor needs to interface with Health and Safety personnel to understand whether these training requirements are being met.

OILY WASTE SOLIDS MANAGEMENT
(Rags and Absorbents)

1. Make sure that the hazardous waste label is visible and readable.
(Trainer to illustrate the label.)
2. Read the label, only add waste that is listed on the label.
3. The drum must be closed except to add waste.
4. Keep the area clean. Wipe oil from the drum top, drum sides, and floor.
5. If the label is damaged or if there is a spill, or for more information, contact the Environmental Supervisor (Bill Boscacci) at ext. 2166 or on the radio.
6. Do not move drums without notifying the Environmental Supervisor, Bill Boscacci.

USED OIL WASTE MANAGEMENT

1. Make sure that the hazardous waste label is visible and readable.
(Trainer to illustrate the label.)
2. Read the label, only add waste that is listed on the label.
3. The drum must be closed except to add waste.
4. Keep the area clean. Wipe oil from the drum top, drum sides, and floor.
5. If the label is damaged or if there is a spill, or for more information, contact the Environmental Supervisor (Bill Boscacci) at ext. 2166 or on the radio.
6. Do not move drums without notifying the Environmental Supervisor, Bill Boscacci.

INK AND SOLVENT WASTE MANAGEMENT

1. Make sure that the hazardous waste label is visible and readable.
(Trainer to illustrate the label.)
2. Read the label, only add waste that is listed on the label.
3. Solvent drum:
 - The drum must be closed except to add waste.
 - Must keep in a flammable materials cabinet with a fire extinguisher nearby.
 - Drum must be grounded.
4. Keep the area clean. Wipe oil from the drum top, drum sides, and floor.
5. If the label is damaged or if there is a spill, or for more information, contact the Environmental Supervisor (Bill Boscacci) at ext. 2166 or on the radio.
6. Do not move drums without notifying the Environmental Supervisor, Bill Boscacci.

AEROSOL CAN WASTE MANAGEMENT

1. Make sure that the universal waste label is visible and readable.
(Trainer to illustrate the label.)
2. Read the label, only add waste that is listed on the label.
3. Aerosol Can waste drum:
 - The drum must be closed except to add waste.
4. Keep the area clean.
5. If the label is damaged or if there is a spill, or for more information, contact the Environmental Supervisor (Bill Boscacci) at ext. 2166 or on the radio.
6. Do not move drums without notifying the Environmental Supervisor, Bill Boscacci.

SWAB HEAD MANAGEMENT

1. Be sure the hazardous waste label is visible and readable. (Trainer to illustrate the label.)
2. Read the label, only add waste that is listed on the label.
3. The drum must be closed except to add waste.
4. If the label is damaged or if there is a spill, or for more information, contact the Environmental Supervisor (Bill Boscacci) at ext. 2166 or on the radio.
5. Do not move drums without notifying the Environmental Supervisor, Bill Boscacci.

To add swab head to the drum:

- Open the slide gate on the drum top below the cutter.
- Insert used swab into cutter blades and slide swab head back against blades.
- Cut swab head off and make sure it goes into the drum.
- After cutting last swab. Close slide gate on drum and dispose of handle for recycling.

BIN ACCUMULATION
(EP Dust, Waste Batch Dust, Mold Dust and Oily Cullet)

1. Be sure the hazardous waste label is visible and readable. (Trainer to illustrate the label.)
2. Read the label, only add waste that is listed on the label.
3. The bin must be closed except to add waste.
4. Any questions about adding waste to bins should be brought to Bill Boscacci (the Environmental Supervisor) immediately.
5. Any spilled material should be immediately reported to the Environmental Supervisor for instructions on cleanup.
6. Contact the Environmental Supervisor, Bill Boscacci, at ext. 2166 or on the radio.

AMMONIA, PROPANE, and DIESEL FUEL
DELIVERIES
(SECURITY GUARD INSTRUCTIONS)

1. Accept deliveries between the hours of 7:00 a.m. and 2:30 p.m.
WEEKDAYS ONLY

If a truck arrives at other times, instruct the driver to return within these specified time periods.

2. Contact Bill Boscacci at ext. 2166 or by radio to advise him that a truck has arrived. Instruct the driver to wait until checked in by Bill or his designated assistant.

Jaime Moreno is the alternate contact if Bill is not available.

3. Advise the driver that he is not to connect for filling until instructed to do so by Bill or his assistant.
4. If an appropriate plant person is not available to oversee the unloading, instruct the driver to return when an appropriate person is available.

HAZARDOUS WASTE ACCUMULATION AREA

1. This door must be closed and locked except to add or remove waste.
2. Do not leave containers outside the locked containment area. Call the Environmental Supervisor, Bill Boscacci, at ext. 2166 for instruction on proper handling.
3. No material is to be placed in this area unless it is properly containerized and labeled.
4. Containers must be clean sealed and properly labeled.
5. Containers must be stored so each label is clearly visible and readable in its designated area.
6. Spilled material must be cleaned up immediately according to instructions from Bill Boscacci.
7. If any of the above are not correct, if there is a spill, or for more information, contact Bill Boscacci, at ext. 2166 or on the radio.
8. Do not move drums without notifying Bill Boscacci.
9. In case of emergency, call security or plant emergency at ext. 2020.

Attachment 3

Recycling of EP dust and Glass bead blast

EP Dust

Owens claims an exemption according to § 25143.2(b) (3) for the EP dust because it is material derived from the process being returned to the process. The material is not reclaimed, rather it is used in its original form as a raw material feedstock. Under California's statute, Owens qualifies for the waste exemptions, pursuant to Health and Safety code (HSC) § 25143.2(b), which says:

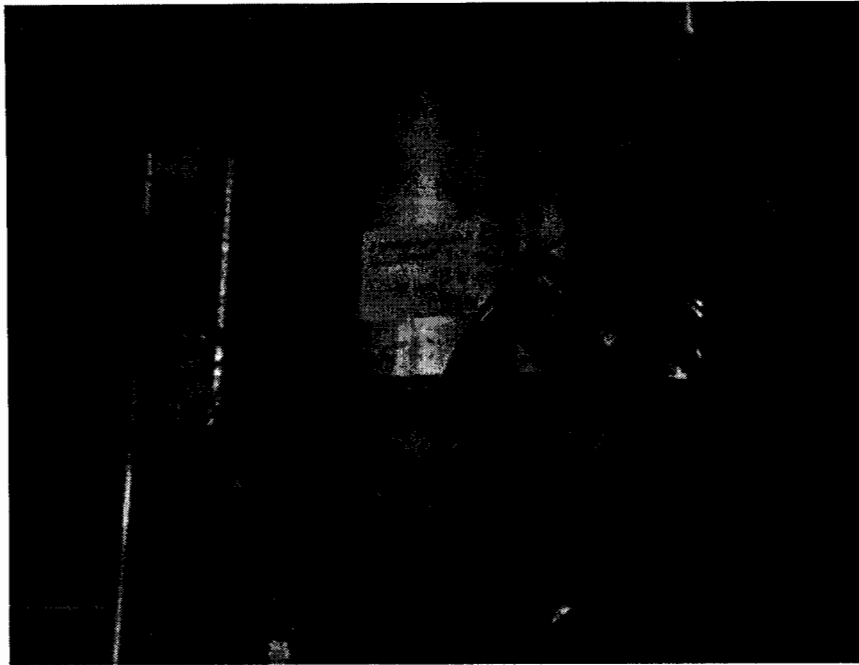
(b) Except as otherwise provided in subdivisions (e), (f), and (g), recyclable material that is managed in accordance with Section 25143.9 and is or will be recycled by any of the following methods shall be excluded from classification as a waste:

- (1) Used or reused as an ingredient in an industrial process to make a product if the material is not being reclaimed.
- (2) Used or reused as a safe and effective substitute for commercial products if the material is not being reclaimed.
- (3) Returned to the original process from which the material was generated, without first being reclaimed, if the material is returned as a substitute for raw material feedstock, and the process uses raw materials as principal feed-stocks.

EP dust is raw material used to manufacture glass that is collected in the electrostatic precipitator and transferred automatically via pipe to a silo in the batch house where it is mixed into the batch.



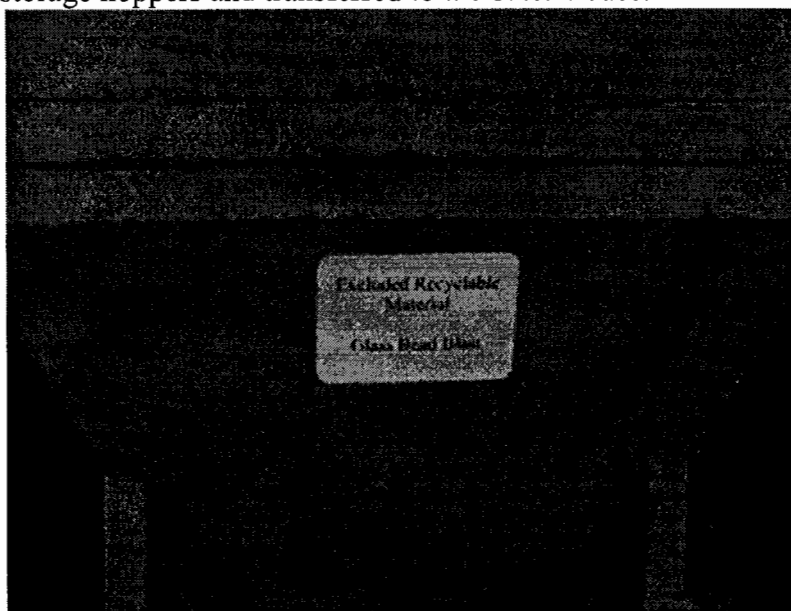
Pipe used to transfer EP dust



EP silo in the batch house

Glass bead blast

Owens claims an exemption for the glass bead blast according to § 25143.2(b) (1) because it is a substitute material. Glass bead blast is brought for the purpose of bead blasting bottle molds smooth. The shattered glass beads are collected from the bead blast machine into storage hoppers and transferred to the batch house.



As these photos show the storage containers and transfer containers are labeled "Excluded Recyclable Material" which satisfy the requirements of § 25143.9(a) which states,

A recyclable material shall not be excluded from classification as a waste pursuant to subdivision (b) or (d) of Section 25143.2, unless all of the following requirements are met:

(a) If the material is held in a container or tank, the container or tank is labeled, marked, and placarded in accordance with the department's hazardous waste labeling, marking, and placarding requirements which are applicable to generators, except that the container or tank shall be labeled or marked clearly with the words "Excluded Recyclable Material" instead of the words "Hazardous Waste," and manifest document numbers are not applicable. If the material is used oil, the containers, aboveground tanks, and fill pipes used to transfer oil into underground storage tanks shall also be labeled or clearly marked with the words "Used Oil".

(b) The owner or operator of the business location where the material is located has a business plan that meets the requirements of Section 25504, including, but not limited to, emergency response plans and procedures, as described in subdivision (b) of Section 25504, which specifically address the material or that meet the department's emergency response and contingency requirements which are applicable to generators of hazardous waste.

(c) The material shall be stored and handled in accordance with all local ordinances and codes, including, but not limited to, fire codes, governing the storage and handling of the hazardous material. If a local jurisdiction does not have an ordinance or code regulating the storage of the material, including, but not limited to, an ordinance or code requiring secondary containment for hazardous material storage areas, the material shall be stored in tanks, waste piles, or containers meeting the department's interim status regulations establishing design standards applicable to tanks, waste piles, or containers storing hazardous waste.

Additionally, our Business Plan includes the material in the material inventory list and the emergency response plan addresses the material specifically. The material is stored and handled in compliance with local ordinances and codes.

7001 0320 0002 4540 8349

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
Postage	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Send to Covers Illinois Oakland Plant Street, Apt. No., or PO Box No. 3600 Alameda Avenue City, State, ZIP+4 Oakland, CA 94601	
PS Form 3800, January 2001 See Reverse for Instructions	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

CERTIFIED MAIL NO.
RETURN RECEIPT REQUESTED

In reply, refer to:
EPA ID No. CAT000618918

WARNING LETTER

Bill Boscacci
Environmental Engineer
Owens Illinois, Oakland Plant
3600 Alameda Avenue
Oakland, CA 94601

Dear Mr. Boscacci:

On February 24, 2004, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA) at Owens Illinois, Oakland Plant, with EPA ID number CAT000618918 (O-I or the "facility"). During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U.S.C. 6927].

A copy of the RCRA Compliance Evaluation Inspection Report (the "report") is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with the RCRA regulations and potential violations of the California authorized program under RCRA Subtitle C. Any omissions in the report shall not be construed as a determination of compliance with applicable regulations.

MAIL CODE	WST-3	WST-3				
SURNAME	Drum	Herman				
DATE	4/20/04	4/30/04				

U.S. EPA CONCURRENCES

OFFICIAL FILE COPY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MAY 03 2004

CERTIFIED MAIL #7001 0320 0002 4540 8349
RETURN RECEIPT REQUESTED

In reply, refer to:
EPA ID No. CAT000618918

WARNING LETTER

Bill Boscacci
Environmental Engineer
Owens Illinois, Oakland Plant
3600 Alameda Avenue
Oakland, CA 94601

Dear Mr. Boscacci:

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Pursuant to Section 3008 of RCRA [42 U.S.C. 6928], you are required to correct the identified areas of noncompliance and to submit the documentation of their correction to U.S. EPA within **30 calendar days** from the date of this letter. Please provide the following requested information:

1. Photograph showing that the spent solvent accumulated in one liter containers for cleaning ink heads are properly labeled, pursuant to 22 CCR § 66262.34(e).
2. A written description of training provided to hazardous waste handlers that includes their specific emergency procedures (e.g., containment and/or cleanup of spills), pursuant to 22 CCR § 66265.16 (a)(2).
3. Provide a description and certification of compliance related to your recycling of EP dust and bead blast dust with California Health and Safety Code Section 25143.9, which says in part:
 - (a) If the material is held in a container or tank, the container or tank is labeled, marked, and placarded in accordance with the department's hazardous waste labeling, marking, and placarding requirements which are applicable to generators, except that the container or tank shall be labeled or marked clearly with the words "Excluded Recyclable Material" instead of the words "Hazardous Waste," and manifest document numbers are not applicable.
 - (b) The owner or operator of the business location where the material is located has a business plan that meets the requirements of Section 25504, including, but not limited to, emergency response plans and procedures, as described in subdivision (b) of Section 25504, which specifically address the material or that meet the department's emergency response and contingency requirements which are applicable to generators of hazardous waste.
 - (c) The material shall be stored and handled in accordance with all local ordinances and codes, including, but not limited to, fire codes, governing the storage and handling of the hazardous material. If a local jurisdiction does not have an ordinance or code regulating the storage of the material, including, but not limited to, an ordinance or code requiring secondary containment for hazardous material storage areas, the material shall be stored in tanks, waste piles, or containers meeting the department's interim status regulations establishing design standards applicable to tanks, waste piles, or containers storing hazardous waste.

Your response must include a letter signed by a duly authorized official of your facility, certifying correction of the identified areas of noncompliance. Where compliance cannot be achieved within 30 days, you must provide the reasons for the delay, a description of the corrective action planned and a schedule on which a corrective action will be taken.

By copy of this letter, U.S. EPA is providing the State of California with notice of the referenced violations of Subtitle C of RCRA. This letter shall not be construed as a

determination by U.S. EPA of your compliance with any other applicable regulations. O-I should continue to take the necessary steps to maintain and ensure compliance with all applicable Federal, State and local environmental requirements.

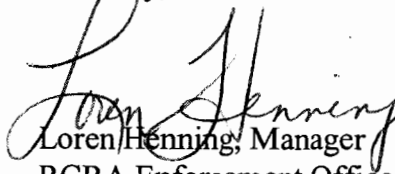
U.S. EPA routinely provides copies of inspection reports to State agencies, and upon request, to the public. Such releases will be handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fourteen (14) working days from the date of this letter. U.S. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

Your response to this Warning Letter, due within **30 calendar days** from the date of this letter, shall be mailed to:

Nancy Rumrill, WST-3
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

If you have questions related to the report or this letter, please contact Nancy Rumrill at (415) 972-3293.

Sincerely,


Loren Henning, Manager
RCRA Enforcement Office

Enc.

cc (w/enc): Charles McLaughlin, State Regulatory Program Division, DTSC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

Date of Inspection: February 24, 2004

U.S. EPA Inspectors: Nancy Rumrill
Environmental Engineer

Ron Brown
Environmental Protection Specialist

FACILITY INFORMATION

EPA ID Number: CAT000618918

Name: Owens Brockway Glass Containers, Plant 20

Location: 3600 Alameda Ave
Oakland, CA 94601

Representative: William L. Boscacci
Environmental Engineering Supervisor

Phone: (510) 436-2166

Report Prepared By: Nancy Rumrill

Report Date: April 16, 2004

A. INTRODUCTION

This report documents the routine RCRA Compliance Evaluation Inspection (CEI) of Owens Brockway Glass Containers, Plant 20 with EPA ID number CAD 000 618 918 (Owens or the facility), located at 3600 Alameda Ave, Oakland, California. The United States Environmental Protection Agency, Region 9, (EPA) inspected the facility to evaluate compliance with the applicable regulations in Title 22 California Code of Regulations (CCR) Division 4.5 and Title 40 Code of Federal Regulations (CFR) Parts 261 through 266, 268, 270 and 279.

B. INVESTIGATION

On February 24, 2004, Nancy Rumrill and Ron Brown of EPA conducted the inspection of the facility. EPA inspectors provided the facility representative, William Boscacci, a copy of EPA's Information Sheet for Small Businesses. During the opening interview, Mr. Boscacci briefly described the facility's operations. After that, the EPA inspectors conducted the inspection of the facility's operation and waste activities.

1. Background

The facility submitted a Notification of Hazardous Waste Activity (EPA Form 8700-12) in March, 1987. According to the California Department of Toxic Substances (DTSC) Hazardous Waste Tracking System, the facility has shipped various RCRA wastes including D001, D002, D007, D008, D039, and F002 in the last three years. According to the facility representative, the facility is a large quantity generator of RCRA hazardous waste.

2. Operations and Waste Generation Description

The facility manufactures UV green, dead leaf green, and clear glass bottles: currently 80% are wine bottles, and the rest are apple juice and salsa bottles. The process consists of three furnaces, forming machines, annealing ovens, automatic inspection, bottle marking, packaging, and shipment. In 2003, the facility generated approximately 210,000 tons of glass. Approximately 400 employees work at the facility.

The facility typically generates used oil, electrostatic precipitator (EP) dust, grit blast dust, waste solvent, waste paint, and safety klean naphtha. The furnaces that produce colored glass exhaust to an electrostatic precipitator. Owens generates EP dust, which is a RCRA D008, D007 and recently a D006 waste, from clean-out of the control device and bead blast dust, which is a RCRA D008 and D007 waste, from cleaning or reconditioning glass molds. Owens also generates solvent waste, which is a RCRA D039 and D001 waste, from cleaning ink heads for marking bottles and used oil, a non-RCRA California only hazardous waste, from equipment maintenance and swap heads used to lubricate the glass molds.

Owens does not currently accumulate EP dust and bead blast dust because they are able to

reuse it as a feed material in the furnace, and, therefore, they claim to qualify for the recycling exemption, pursuant to California's Health and Safety code (HSC) 25143.2 (b) (see also 40 CFR §261.2 (e)). This exemption states:

(b) Except as otherwise provided in subdivisions (e), (f), and (g), recyclable material that is managed in accordance with Section 25143.9 and is or will be recycled by any of the following methods shall be excluded from classification as a waste:

(1) Used or reused as an ingredient in an industrial process to make a product if the material is not being reclaimed.

(2) Used or reused as a safe and effective substitute for commercial products if the material is not being reclaimed.

(3) Returned to the original process from which the material was generated, without first being reclaimed, if the material is returned as a substitute for raw material feedstock, and the process uses raw materials as principal feedstocks.

The facility representative has not yet provided information that they are managing the material in accordance with HSC Section 25143.9.

3. Walk-through

In the selective maintenance area, EPA inspectors observed the satellite location where solvent is used to clean ink heads for the glass marking process. EPA inspectors observed four one-liter bottles of waste solvent, which were not properly labeled and one of them was open. During the walk-through, EPA inspectors did not document any other potential violations.

4. Record Review

EPA inspectors reviewed manifests from the last three years, Land Disposal Restriction notifications, the Contingency Plan, and Training records. EPA inspectors found that the training program did not adequately document how Mike Burns and Kirk Washington, who are hazardous waste handlers, are trained in emergency procedures such as their response procedures related to spills, fire, or other contingencies. EPA inspectors did not document any other potential violations.

C. POTENTIAL RCRA VIOLATIONS

1. Labeling Satellite Containers.

22 CCR § 66262.34(e)

(40 CFR § 262.34(e))

(e) (1) A generator may accumulate as much as 55 gallons of hazardous waste, one quart of acutely hazardous waste (listed in section 66261.33(e)) or one quart of extremely hazardous waste at or near any point of generation, without a permit or grant of interim status, without

complying with subsections (a), (b) and (c) of this section, if all of the following requirements are met with respect to this waste:

(C) the initial date of waste accumulation is clearly marked and visible for inspection on each container used for accumulation of hazardous waste;

(E) the generator complies with subsections (e)(2), (e)(3) and (f)(3) of this section.

(f) Generators who accumulate hazardous waste on site without a permit or grant of interim status shall comply with the following requirements:

(3) each container and tank used for onsite accumulation of hazardous waste shall be labelled or marked clearly with the words, "Hazardous Waste." Additionally, all containers and portable tanks shall be labelled with the following information:

(A) composition and physical state of the wastes;

(B) statement or statements which call attention to the particular hazardous properties of the waste (e.g., flammable, reactive, etc.);

(C) name and address of the person producing the waste.

Finding:

In the selective maintenance area, EPA inspectors observed the satellite location where solvent is used to clean ink heads for the glass marking process. EPA inspectors observed four one-liter bottles of waste solvent, which were not properly labeled and one of them was open. Owens failed to label satellite containers in violation of 22 CCR §66262.34(e)(1)(C), (E), and (f)(3).

2. Open Satellite Container.

22 CCR § 66262.34(e)

(40 CFR § 262.34(e))

(e) (1) A generator may accumulate as much as 55 gallons of hazardous waste, one quart of acutely hazardous waste (listed in section 66261.33(e)) or one quart of extremely hazardous waste at or near any point of generation, without a permit or grant of interim status, without complying with subsections (a), (b) and (c) of this section, if all of the following requirements are met with respect to this waste:

(D) the generator complies with sections 66265.171, 66265.172, and 66265.173(a) of this division.

22 CCR § 66265.173. Management of Containers.

(40 CFR § 265.173)

(a) A container holding hazardous waste shall always be closed during transfer and storage, except when it is necessary to add or remove waste.

Finding:

In the selective maintenance area, EPA inspectors observed the satellite location where solvent is used to clean ink heads for the glass marking process. EPA inspectors observed four one-liter bottles of waste solvent, which were not properly labeled and one of them was open. Owens failed to close a satellite container in violation of 22 CCR §§66262.34(e)(1)(D) and 66265.173(a).

In a letter dated March 9, 2004, the facility representative confirmed that the container has been closed (see attachment 2).

3. Training Personnel.

**22 CCR § 66262.34
(40 CFR § 262.34)**

(a) Except as provided in subsection (c) and (d) of this section and section 66262.35, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or grant of interim status, provided that:

(4) the generator complies with the requirements for owners or operators in articles 3 and 4 of chapter 15 of this division and with section 66265.16, and with section 66268.7(a)(5).

**22 CCR § 66265.16. Personnel Training.
(40 CFR § 265.16)**

(a)(2) This program shall be directed by a person trained in hazardous waste management procedures, and shall include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

Finding:

EPA inspectors found that the training program did not adequately document how Mike Burns and Kirk Washington, who are hazardous waste handlers, are trained in emergency procedures such as their response procedures related to spills, fire, or other contingencies. Owens failed to show that their hazardous waste handlers were adequately trained in hazardous waste management procedures (including contingency plan implementation) relevant to their positions in violation of 22 CCR §§66262.34(a) and 66265.16 (a)(2).

D. LIST OF ATTACHMENTS

Letter from Owens Illinois dated March 9, 2004

ATTACHMENT

March 9, 2004



Bill Boscacci
Environmental Engineer
Owens Illinois, Oakland Plant
3600 Alameda Avenue
Oakland, CA 94601
(510) 436- 2166

Nancy Rumrill
Enforcement Officer
Environmental Protection Agency
WST-3
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Rumrill,

You will find enclosed with this letter the laboratory results of a sample of the material in the drums you observed in our 90-day Hazardous Waste Storage Area. As you can see from the results the material is non-hazardous. This material will be disposed of with our non-hazardous waste.

Also, I would like to update you on the three other items of concern that you noted during your inspection of our facility on February 24, 2004.

1. You observed the used ink receptacle on the printer head cleaning machine had a connection on the return line that was open to the atmosphere. We have devised a new return line that seals this connection.
2. You expressed concern that the training documentation did not cover all of the training required of a Hazardous Waste mover. This is because we train using different modules (Hazardous Communication, Spill Response, and Hazardous Materials Management) and documented that training occurred under a single heading of Hazardous Materials Management. You have indicated that the preferred training method is train from a single program that includes the different modules and document that training was done from that single program. We have developed that inclusive training program and will train from it in the future.

Packaging Solutions - Everywhere, Everyday

3600 Alameda Ave. • Oakland, CA 94601 • Tel: 510-436-2000 • Fax: 510-436-2076

3. You observed a bucket containing used swab heads and mold dope at the C-Forming Hazardous Waste Satellite Accumulation Area which had no labels designating the contents. This bucket was used to transfer used swab heads from the generation point to the Satellite Accumulation Area, so that oil would not drip on the floor. It was used more than once a shift. The Department Supervisor has determined the practice unnecessary and it has been terminated.

I hope our actions meet with your satisfaction, if there is anything you would like for me to change let me know. Although EPA inspections can be difficult to endure it does give me a certain amount of satisfaction to receive a complement from the inspector that we are well organized and our compliance programs are working.

Sincerely,

A handwritten signature in cursive script that reads "W Boscacci".

Bill Boscacci
Environmental Engineer
Owens-Illinois

Cc: Dwayne Wendler
Plant Manager

California Title 26 Metals

Lab #:	170837	Project#:	STANDARD
Client:	Owens Brockway		
Field ID:	DESICANT BEADS	Basis:	as received
Lab ID:	170837-001	Diln Fac:	1.000
Matrix:	Miscell.	Sampled:	02/23/04
Units:	mg/Kg	Received:	02/26/04

Analyte	Result	RL	Batch#	Prepared	Analyzed	Prep	Analysis
Antimony	ND	3.3	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Arsenic	1 . 7	0.27	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Barium	ND	0.55	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Beryllium	0 . 17	0.11	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Cadmium	ND	0.27	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Chromium	ND	0.55	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Cobalt	ND	1.1	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Copper	1 . 4	0.55	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Lead	ND	0.16	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Mercury	ND	0.019	89 101	03/08/04	03/ 08/04	METHOD	EPA 7471
Molybdenum	ND	1.1	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Nickel	ND	1.1	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Selenium	ND	0.27	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Silver	ND	0.27	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Thallium	ND	0.27	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Vanadium	1 . 2	0.55	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B
Zinc	7 . 5	1.1	88 920	03/01/04	03/ 02/04	EPA 3050	EPA 6010B

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Tuesday, October 26, 2010



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Department of Toxic Substances Control

DTSC: HWTS Reports

HWTS - RCRA Waste Code By Year Matrix

EPA ID: CAT000618918 **Name:** OWENS-ILLINOIS INC
OAKLAND PLT 20
Entity: Generator

Oakland

My CA ☐ Title Site
 Search Tips

RCRA Code	Description	Weight (in Tons)																	
		1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
	Blank/Unknown	997.68750	738.23230	76.57900	95.93840	80.53450	89.87600	520.39200	288.98540	214.66570	213.06290	243.63758	22.17110	45.62698	36.11414	124.22158	35.46960	81.86010	21.34800
	Blank/Unknown														2.30435				
D001	Ignitable	6.68030	0.61000	0.54100		0.26400	0.20000		0.30000	0.96500	0.60465	0.81350	0.78300	0.77150	0.10800				
D002	Corrosives	1.63000	3.90750	1.20000	2.10000	1.70000	2.08500	7.67200	0.01000	4.03150	0.45000				0.04170				
D006	Cadmium			12.64200	25.28400	58.99600	30.50880						52.21120	72.90680	15.77040			47.19680	
D007	Chromium			16.85600		21.07000	19.38440	136.53360	78.48080		25.28400	160.13200	281.85600	1,622.75000	0.84280			10.50000	
D008	Lead						33.71200	139.81200	29.49800	123.04880	54.88200	166.87440	16.85600		15.17040	8.42800	34.05640	64.95060	20.85000
D010	Selenium								0.00500							137.66240	19.68140	10.11360	8.42800
D039	Tetrachloroethylene		2.05150	3.65660	1.03810	0.53350	2.51850	0.08400	1.90680	5.05870	0.22509	0.08340							
F002	Halogenated solvents	0.52000	0.24750						0.05000	0.09000									
F003	Non-halogenated solvents				0.90000														
F005	Non-halogenated solvents				0.30000											0.18150	0.18150	0.19800	
NONE	Blank/Unknown											12.97874	17.61976						
	TOTALS	1,006.51780	745.04880	111.47460	125.56050	163.09800	178.28470	804.49360	399.23600	347.85970	294.50864	571.54088	386.85604	1,759.67504	70.35179	270.49348	89.38890	214.81910	50.62600



Cal/EPA | Air Resources Board | California Integrated Waste Management Board | Department of Pesticide Regulation
 Office of Environmental Health Hazard Assessment | State Water Resources Control Board

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Department of Toxic Substances Control

Jesse R. Huff, Director
700 Heinz Avenue, Bldg. F, Suite 200
Berkeley, California 94710-2721



Pete Wilson
Governor

Peter M. Rooney
Secretary for
Environmental
Protection

August 20, 1998

Mr. Leroy Griffin
City of Oakland, Office of Emergency Services
One City Hall Plaza
Oakland, California 94612

Dear Mr. Griffin:

On April 9, 1998, the United States Environmental Protection Agency (U.S. EPA) conducted a hazardous waste generator inspection at Owens-Brockway Glass Containers, 3600 Alameda Avenue, Oakland. Please find attached to this letter a copy of U.S. EPA's inspection report issued by Mr. Clint Seiter. This inspection report may contain potential non-RCRA violations noted during the inspection as well as violations of RCRA regulations.

Should potential violations be noted in the report, the City of Oakland is expected to take appropriate enforcement to ensure compliance with applicable hazardous waste laws and regulations. Please be advised that this report may contain confidential trade secret information which must be handled in accordance with the requirements of California Health and Safety Code (H&SC), Section 25173.

Should you have any questions regarding the transmittal of this inspection report or the requirements of H&SC, Section 25173 please feel free to contact Mickey Pierce at (510) 540-3851. Questions regarding the contents or potential violations noted in the report should be addressed to Mr. Clint Seiter, U.S. EPA, Region 9, at (415)744-2141.

Sincerely,

Lawrence Wong, Section Chief
State Regulatory Programs Division
Northern California Branch

Attachment

bcc: Mr. Clint Seiter, WST-3-1
Waste Compliance Branch
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, California 94105

Mr. Steve Armann, WST-3-1
Waste Compliance Branch
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, California 94105

Mr. Charles A. McLaughlin, Chief
Northern California Branch
State Regulatory Programs Division
Department of Toxic Substances Control
10151 Croydon Way, Suite 3
Sacramento, California 95827-2106

Ms. Paula Rasmussen, Chief
State Regulatory Programs Division
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630



Department of Toxic Substances Control

Jesse R. Huff, Director
700 Heinz Avenue, Bldg. F, Suite 200
Berkeley, California 94710-2721



Pete Wilson
Governor

Peter M. Rooney
Secretary for
Environmental
Protection

August 20, 1998

Mr. Hugh Murphy
Hayward City Fire Department
777 "B" Street
Hayward, California 94541

Dear Mr. Murphy:

On April 13, 1998, the United States Environmental Protection Agency (U.S. EPA) conducted a hazardous waste generator inspection at Owens-Brockway Glass Containers, 22302 Hathaway Avenue, Hayward. Please find attached to this letter a copy of U.S. EPA's inspection report issued by Mr. Clint Seiter. This inspection report may contain potential non-RCRA violations noted during the inspection as well as violations of RCRA regulations.

Should potential violations be noted in the report, the City of Hayward is expected to take appropriate enforcement to ensure compliance with applicable hazardous waste laws and regulations. Please be advised that this report may contain confidential trade secret information which must be handled in accordance with the requirements of California Health and Safety Code (H&SC), Section 25173.

Should you have any questions regarding the transmittal of this inspection report or the requirements of H&SC, Section 25173 please feel free to contact Mickey Pierce at (510) 540-3851. Questions regarding the contents or potential violations noted in the report should be addressed to Mr. Clint Seiter, U.S. EPA, Region 9, at (415) 744-2141.

Sincerely,

Lawrence Wong, Section Chief
State Regulatory Programs Division
Northern California Branch

Attachment

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Waste Compliance Branch
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, California 94105

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10151 Croydon Way, Suite 3
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State Regulatory Programs Division
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630



Department of Toxic Substances Control



Jesse R. Huff, Director
700 Heinz Avenue, Bldg. F, Suite 200
Berkeley, California 94710-2721

Pete Wilson
Governor

Peter M. Rooney
Secretary for
Environmental
Protection

August 20, 1998

Mr. Leroy Griffin
City of Oakland, Office of Emergency Services
One City Hall Plaza
Oakland, California 94612

Dear Mr. Griffin:

On April 9, 1998, the United States Environmental Protection Agency (U.S. EPA) conducted a hazardous waste generator inspection at Owens-Brockway Glass Containers, 3600 Alameda Avenue, Oakland. Please find attached to this letter a copy of U.S. EPA's inspection report issued by Mr. Clint Seiter. This inspection report may contain potential non-RCRA violations noted during the inspection as well as violations of RCRA regulations.

Should potential violations be noted in the report, the City of Oakland is expected to take appropriate enforcement to ensure compliance with applicable hazardous waste laws and regulations. Please be advised that this report may contain confidential trade secret information which must be handled in accordance with the requirements of California Health and Safety Code (H&SC), Section 25173.

Should you have any questions regarding the transmittal of this inspection report or the requirements of H&SC, Section 25173 please feel free to contact Mickey Pierce at (510) 540-3851. Questions regarding the contents or potential violations noted in the report should be addressed to Mr. Clint Seiter, U.S. EPA, Region 9, at (415)744-2141.

Sincerely,

Lawrence Wong, Section Chief
State Regulatory Programs Division
Northern California Branch

Attachment

bcc: Mr. Clint Seiter, WST-3-1
Waste Compliance Branch
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, California 94105

Mr. Steve Armann, WST-3-1
Waste Compliance Branch
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, California 94105

Mr. Charles A. McLaughlin, Chief
Northern California Branch
State Regulatory Programs Division
Department of Toxic Substances Control
10151 Croydon Way, Suite 3
Sacramento, California 95827-2106

Ms. Paula Rasmussen, Chief
State Regulatory Programs Division
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, CA 94105-3901**

August 17, 1998
In reply, refer to WST-3-1

Owens-Brockway Glass Containers
P.O. Box 1019
Oakland, CA 94604

Attn: Mr. Hank Wiegel, Plant Engineer

Re: Certification of Violation Correction for Owens-Brockway Glass Containers, Oakland, California

Dear Mr. Wiegel:

On April 9, 1998, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA) at Owens-Brockway Glass Containers, Oakland, CA, U.S. EPA ID # CAT000618918. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U.S.C. 6927].

Pursuant to Section 3008 of RCRA [42 U.S.C. 6928] U.S. EPA required you to correct the identified areas of noncompliance and to submit documentation of their correction to the U.S. EPA.

The facility's subsequent responses, dated August 12, 1998, adequately addresses the violations and documents the facility's return to compliance with the regulations cited in the inspection report. This letter shall not be construed as a determination by U.S. EPA of your compliance with any other applicable regulations.

Owens-Brockway should continue to take the necessary steps to maintain and ensure compliance with all applicable Federal, State and local environmental requirements.

If you have any questions please call Clint Seiter of my staff at (415) 744-2141.

Sincerely,

A handwritten signature in black ink that reads "Ron Brown". The signature is written in a cursive, slightly slanted style.

Ron Brown, Acting Chief
Compliance Monitoring and
Enforcement Section

cc: Paula Rasmussen, DTSC

RCRA COMPLIANCE INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 9
HAZARDOUS WASTE MANAGEMENT DIVISION
WASTE COMPLIANCE EVALUATION

Purpose:	RCRA Compliance Evaluation
Facility:	Owens-Brockway Glass Containers 3600 Alameda Ave. Oakland, CA 94601
EPA ID Number:	CAT000618918
Date of Inspection:	April 9, 1998
EPA Representative:	Clint Seiter Environmental Protection Specialist (415) 744-2141
City of Oakland Fire Services Agency Representative:	Hernan Gomez Hazardous Materials Inspector (510) 238-7253
Facility Representative:	Hank Wiegel Plant Engineer (510) 436-2181
Report Prepared By:	Clint Seiter
Report Date:	June 16, 1998

BACKGROUND

Owens-Brockway Glass Containers, a unit of Owens-Illinois, is a glass manufacturing facility located at 3600 Alameda Avenue, Oakland, CA 94601. It has been in operation for approximately sixty years and employs approximately 500 people. 70% of the facility's product line consists of wine bottles, with the remainder being food and beverage bottles. The facility has three furnaces, each furnace devoted exclusively to a particular color of glass (green, amber and clear (or flint)). Most of the bottles manufactured come from recycled glass (cullet), which is ground down and remelted, with the remainder glass made on site from silica sand mixed with salt cake, soda ash, limestone, and colorizers or de-colorizers. Approximately 875 tons of glass containers are manufactured every working day. Each furnace has an approximate 450 ton holding capacity for molten glass. Furnaces attain a temperature of 2750 degrees to achieve proper melting of the raw materials.

The facility operates forty forklifts, three trucks, one bobcat and two payloaders, which are maintained on the site.

MANUFACTURING PROCESS

Raw materials are blended together in batches in the proper proportions for the desired quality of glass. The batches are transported via closed conveyor belts to the facility furnaces, where the batch material is melted down to molten glass. The molten glass is drawn from the bottom of the furnace, via the throat to feeders. Orifices in the feeders control the amount of molten glass let through, and shears cut off the bottoms of the gobs (discreet units of molten glass) to the desired length (the weight of the gob is determined to an accuracy of one hundredth place). The gobs are first formed into blanks, called "parisons", which are then transferred into molds (two at a time) in machines called shops (there is a total of eight shops in the facility). The molds in each shop can be configured to whatever specifications are required for the particular bottle. Bottles are formed when compressed air is blown into the molds containing the gobs. The bottles then go through an annealing process where they are reheated in lehrs to temperatures up to 1030 degrees and then gradually cooled down. After the bottles are sufficiently cooled, they are sprayed with a poly-coat mixture that increases the bottles' lubricity (scratch resistance).

The bottles are then checked by means of optical equipment for various potential defects (irregular wall thickness, blisters, cracks, specks, etc.) and defective bottles are removed from the assembly line (to be recycled as cullet). The bottles that pass inspections are eventually packaged and transported off to the customers.

WASTES GENERATED

The following wastes are generated at the facility

1. Used Oil: The hot glass is quenched by water as it is ejected out of the shop. This water picks

up lubricating oil from the shop machinery, and before the water is recycled, it is directed to a skim pond. Used oil is skimmed off the pond and diverted to an above-ground tank. Used oil is also generated through routine vehicular maintenance at the vehicle maintenance center.

2. Checker Dust: Dust contaminated with chromium and lead (from crushed cullet) accumulates on the bottom of the exhaust chambers that flank the furnaces. Approximately once every three years this dust is vacuumed out and shipped off to be disposed of as D007 and D008 waste.

3. Methyl Ethyl Ketone (MEK): MEK used as a solvent for bottle coders eventually gets contaminated to the point where it has to be disposed of periodically as a D035 waste.

4. EP dust: Dust from the furnace exhaust is collected on electrostatic plates in the exhaust ducts. It generally is recycled into the batches used to make glass, but occasionally, due to recycling system breakdowns, it must be transported off-site for disposal as a D002 waste.

INVESTIGATION

On April 9, 1998, Clint Seiter, representing the Environmental Protection Agency (EPA), and Hernan Gomez, representing the City of Oakland Fire Services Agency, conducted an unannounced site investigation at the Owens-Brockway facility (EPA ID# CAT000618918), located at 3600 Alameda Ave., Oakland, CA 94601. Upon providing introductions and credentials, the inspectors contacted Mr. Hank Wiegel, the Plant Engineer of the facility. Also in attendance was Mr. Steve Springer, the facility general foreman. The inspectors explained that this was a routine inspection to determine whether or not the facility was in compliance with federal and state regulations concerning the proper management of RCRA and non-RCRA hazardous wastes. The inspection would consist of a walk-through of those areas of the facility where hazardous wastes were handled, with photos taken, followed by a record review.

Pre-Walk-Through Briefing

The facility representatives described the manufacturing process (as described above) to the inspectors. Per these representatives, enough waste is generated to qualify the facility as a Large Quantity Generator (LQG).

Walk-Through Inspection

- Raw Material Delivery

The walk-through inspection began where raw materials that make up the glass are received. Trucks delivering these materials deposit their loads through grates onto conveyor belts. The inspectors noted deposits of salt cake (anhydrous sodium sulfate) packed on the pavement surrounding the grate where this substance is off-loaded (photo 1). (The facility reps have since provided documentation that this has been cleaned up (see Attachment 2).) A post-inspection

review of the MSDS for salt cake has indicated that this substance is not a hazardous material (see Attachment 3). Cullet is kept in bins, segregated by color, until ready for use (photo #2). The conveyor belts, which transport the materials to the furnaces, are enclosed and vacuumed daily (the dust vacuumed up is re-entered into the manufacturing process).

- Used Oil Tanks #1 and #2

As mentioned above, water used to quench hot glass becomes contaminated with lubricating oil from the machinery (photo #3). The water from the quench water bins is routed to two skim sumps (photo #4), where the used oil is skimmed and pumped to two interior above-ground used oil tanks adjacent to the sumps. After the oil has been skimmed off the water in the sumps, the water is pumped to an exterior skim pond. These two used-oil tanks (Tank #1 and Tank #2) are located in the facility basement. Whereas Tank #1 (see photo #5) was correctly identified as containing non-RCRA hazardous waste, it was not marked with the words "Used Oil", as is required by Title 22 §66279.21 (this was subsequently corrected by the facility (see Attachment 2)). All other labeling requirements were in order. Similarly, while Tank #2 was also correctly identified as containing non-RCRA hazardous waste, it was not labeled with the words "Used Oil" (see photo #6). As with Tank #1, this has subsequently been corrected (see Attachment 2). Fire extinguishers were mounted close by and their tags indicated that they had been inspected within an acceptable time frame. Eye washes nearby were in working order.

Per Mr. Wiegel, the tanks have been in operation since the construction of the facility. The two tanks are located on a concrete floor which appears to be in good condition (i.e., showed no signs of cracks). The tanks are elevated approximately three inches above the concrete floor on one end (photos #7 and 8). The floor gradually slopes up until, in both instances, it touches the tank bottoms on the other end. There appears to be adequate containment of the tanks in the event of a leak. Should a leak occur, the oil could be directed to the skim sumps next to the tanks (photo #9).

- Satellite Accumulation Area, Machine Repair Shop

Used oil drum was not marked with the words "Used Oil" (see photos #10 and 11)(this has subsequently been corrected (see Attachment #2)). No other violations were noted.

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- Satellite Accumulation Area, Forklift Maintenance Shop

Used oil drum was not marked with the words "Used Oil" (see photos #13 and 14) (this has subsequently been corrected (see Attachment #2)).

- Exterior 4000 Gallon Above-Ground Used Oil Tank

As mentioned above, the water from the skim sumps in the basement is pumped to a skim pond after the used oil is pumped into one of two concrete above-ground tanks located in the basement. Residues of used oil can still be found in the water in the skim pond, and these residues are skimmed off the surface of the pond and pumped into an exterior 4000 gallon above-ground used oil tank. As with the other used oil containers, the tank was not marked with the words "Used Oil" (see photo #15)(this has subsequently been corrected (see Attachment #2)).

Document Review

There were no training records on file, as required by Title 22 §66265.16(d). No discrepancies were found in the manifest review. No other violations noted in facility documentation.

Post Inspection Briefing

The inspectors met with the facility representatives and emphasized the following concerns noted during the inspection:

1. Improper labeling of used oil tanks and containers (since corrected).
2. The salt cake spill in the unloading area (since corrected).
3. Incomplete training records.
4. Potential violations concerning the concrete used oil tanks in the basement.

POTENTIAL VIOLATIONS

Personnel Training

Title 22 §66262.34(a)(4)

A generator may accumulate hazardous waste on-site for 90 days or less without a permit provided that the generator complies with the requirements for owners or operators in Article 4 of chapter 15 and with section 66265.16.

Title 22 §66265.16(d)

The owner or operator shall maintain (training) documents and records at the facility.

There were no training documents at the facility conforming to the requirements of section 66265.16(d)(1)-(4).

Used Oil Labeling

Title 22 §66279.21(b)

Containers and aboveground tanks used to store used oil shall be marked or clearly labeled with the words "USED OIL".

The following facility used oil containers and tanks were not marked with the words "USED OIL" (this has since been corrected by the facility).

- Basement Tanks #1 and #2
- Drum in Machine Repair Shop
- Drum in Selecting Maintenance Shop
- Drum in Forklift Maintenance Shop
- Exterior 4000-gallon Used Oil Tank

ATTACHMENT 1 - PHOTOS

Photo #1- Salt cake deposits on ground in material offloading area

ATTACHMENT 1 - PHOTOS

Photo #2 - Cullet bin

BACKGROUND

Owens-Brockway Glass Containers, a unit of Owens-Illinois, is a glass manufacturing facility located at 3600 Alameda Avenue, Oakland, CA 94601. It has been in operation for approximately sixty years and employs approximately 500 people. 70% of the facility's product line consists of wine bottles, with the remainder being food and beverage bottles. The facility has three furnaces, each furnace devoted exclusively to a particular color of glass (green, amber and clear (or flint)). Most of the bottles manufactured come from recycled glass (cullet), which is ground down and remelted, with the remainder glass made on site from silica sand mixed with salt cake, soda ash, limestone, and colorizers or de-colorizers. Approximately 875 tons of glass containers are manufactured every working day. Each furnace has an approximate 450 ton holding capacity for molten glass. Furnaces attain a temperature of 2750 degrees to achieve proper melting of the raw materials.

The facility operates forty forklifts, three trucks, one bobcat and two payloaders, which are maintained on the site.

MANUFACTURING PROCESS

Raw materials are blended together in batches in the proper proportions for the desired quality of glass. The batches are transported via closed conveyor belts to the facility furnaces, where the batch material is melted down to molten glass. The molten glass is drawn from the bottom of the furnace, via the throat to feeders. Orifices in the feeders control the amount of molten glass let through, and shears cut off the bottoms of the gobs (discreet units of molten glass) to the desired length (the weight of the gob is determined to an accuracy of one hundredth place). The gobs are first formed into blanks, called "parisons", which are then transferred into molds (two at a time) in machines called shops (there is a total of eight shops in the facility). The molds in each shop can be configured to whatever specifications are required for the particular bottle. Bottles are formed when compressed air is blown into the molds containing the gobs. The bottles then go through an annealing process where they are reheated in lehns to temperatures up to 1030 degrees and then gradually cooled down. After the bottles are sufficiently cooled, they are sprayed with a poly-coat mixture that increases the bottles' lubricity (scratch resistance).

The bottles are then checked by means of optical equipment for various potential defects (irregular wall thickness, blisters, cracks, specks, etc.) and defective bottles are removed from the assembly line (to be recycled as cullet). The bottles that pass inspections are eventually packaged and transported off to the customers.

WASTES GENERATED

The following wastes are generated at the facility

1. Used Oil: The hot glass is quenched by water as it is ejected out of the shop. This water picks

RCRA COMPLIANCE INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 9
HAZARDOUS WASTE MANAGEMENT DIVISION
WASTE COMPLIANCE EVALUATION

Purpose:	RCRA Compliance Evaluation
Facility:	Owens-Brockway Glass Containers 3600 Alameda Ave. Oakland, CA 94601
EPA ID Number:	CAT000618918
Date of Inspection:	April 9, 1998
EPA Representative:	Clint Seiter Environmental Protection Specialist (415) 744-2141
City of Oakland Fire Services Agency Representative:	Hernan Gomez Hazardous Materials Inspector (510) 238-7253
Facility Representative:	Hank Wiegel Plant Engineer (510) 436-2181
Report Prepared By:	Clint Seiter
Report Date:	June 16, 1998



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

June 17, 1998

CERTIFIED MAIL NO. P 274 218 184
RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION

In reply, refer to WST-3-1

Hank Wiegel, Plant Engineer
Owens-Brockway
3600 Alameda Ave
Oakland, CA 94601

Dear Mr. Wiegel

On April 9, 1998, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA) at Owens-Brockway Glass Containers at 3600 Alameda Ave., Oakland, CA, U.S. EPA Identification Number C-AT000618918. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U.S.C. 6927]. A copy of the investigation report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with RCRA regulations and potential violations of the California authorized program under RCRA Subtitle C. Any omissions in the report shall not be construed as a determination of compliance with applicable regulations.

1. Title 22 §66265.16(d) lists the following four requirements for adequate facility training records:

- a. the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;**
- b. a written job description for each position listed.**
- c. a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed.**
- d. records that document that the training or job experience required has been given to, and completed by, facility personnel.**

The training documentation you subsequently provided to EPA on April 16, 1998 does not conform to these four requirements. Please resubmit facility training records that conform to these requirements within 30 days of receipt of this letter.

Pursuant to U.S. EPA's Federal Facilities Compliance Strategy and Executive Order 12088, this letter and enclosure require you to correct the identified areas of noncompliance and to submit documentation of their correction to U.S. EPA within 30 calendar days of your receipt of this letter. Your response must include a letter signed by a duly authorized official of your facility, certifying correction of the identified areas of noncompliance. Documentation of your return to compliance may consist of, among other things, photographs, manifests and revised records. Where compliance cannot be achieved within 30 days, you must provide the reasons for the delay, a description of each corrective action planned and a schedule on which each corrective action will be taken.

By copy of this letter, U.S. EPA is providing the State of California with notice of the referenced violations of Subtitle C of RCRA. U.S. EPA is also providing the State with notice that it may take appropriate enforcement action if the facility does not resolve the violations within the time specified above and the State does not take appropriate enforcement action. The State of California may notify U.S. EPA of its intent to assume or decline responsibility to take such action to resolve the referenced violations.

U.S. EPA reserves the right to take further enforcement action as it deems appropriate, in accordance with the Federal Facility Compliance Strategy and Executive Order 12088. However, your response to this letter will be considered in determining the need for further enforcement action. Violations of Subtitle C of RCRA such as those listed in the enclosed report may also be punishable by criminal actions, as provided by Section 3008 of RCRA.

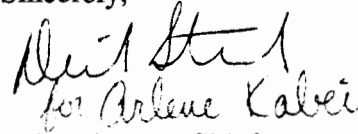
U.S. EPA routinely provides copies of investigation reports to State agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fifteen (15) working days from your receipt of this letter. U.S. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

Your response to this Notice of Violation, due within 30 days of your receipt of this letter, shall be mailed to:

Clint Seiter WST-3-1
Waste Compliance Branch
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

If you have questions related to technical aspects of the investigation report or this letter, please contact Mr. Seiter at (415) 744-2141.

Sincerely,

A handwritten signature in black ink, appearing to read "Arlene Kabei", written over a horizontal line.

Arlene Kabei, Chief
Compliance Monitoring and
Enforcement Section

Enclosure

cc: Paula Rasmussen, Reg. 4 (with enclosure)
Hernan Gomez, Oakland Fire Services (with enclosure)



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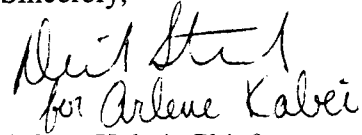
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ATTACHMENT 1

ATTACHMENT 1 - PHOTOS



Photo #1- Salt cake deposits on ground in material offloading area

ATTACHMENT 1 - PHOTOS



Photo #2 - Cullet bin

ATTACHMENT 1 - PHOTOS



Photo #3 - Hot glass quench water vat

ATTACHMENT 1 - PHOTOS



Photo #4 - Oily wastewater skim pond

ATTACHMENT 1 - PHOTOS



Photo #5 - Concrete used oil tank #1

ATTACHMENT 1 - PHOTOS



Photo #6 - Concrete used oil tank #2

ATTACHMENT 1 - PHOTOS



Photo #7 - Basement used oil tank, showing elevation above floor

ATTACHMENT 1 - PHOTOS



Photo #8 - Basement used oil tank, close-up of elevation above floor

ATTACHMENT 1 - PHOTOS



Photo #9 - Skim sump next to used oil tank

ATTACHMENT 1 - PHOTOS



Photo #10 - Used oil drum (unmarked with the words "Used Oil") in satellite accumulation area in the Machine Repair Shop.

ATTACHMENT 1 - PHOTOS



Photo #11 - Closeup of label of used oil drum in satellite accumulation area in the Machine Repair Shop.

ATTACHMENT 1 - PHOTOS



Photo #12 - Used oil drum (unmarked with words "Used Oil") in Satellite Accumulation Area, Selecting Maintenance Shop

ATTACHMENT 1 - PHOTOS



Photo #13 - Used oil drum (unmarked with words "Used Oil") in Satellite Accumulation Area, Forklift Maintenance Shop

ATTACHMENT 1 - PHOTOS



Photo #14 - Closeup of label on used oil drum in Satellite Accumulation Area, Forklift Maintenance Shop

ATTACHMENT 1 - PHOTOS



Photo #15 - Exterior 4000 Gallon Above-Ground Used Oil Tank, unmarked with the words "Used Oil".

ATTACHMENT 2

Raw Material Delivery



Area where green liquid was found.
(Green liquid on basement floor was
cooling tower water with dye in it to find leak)



Cylinder Storage Basement Area Between A & B Furnace



D-Furnace Peep Hole



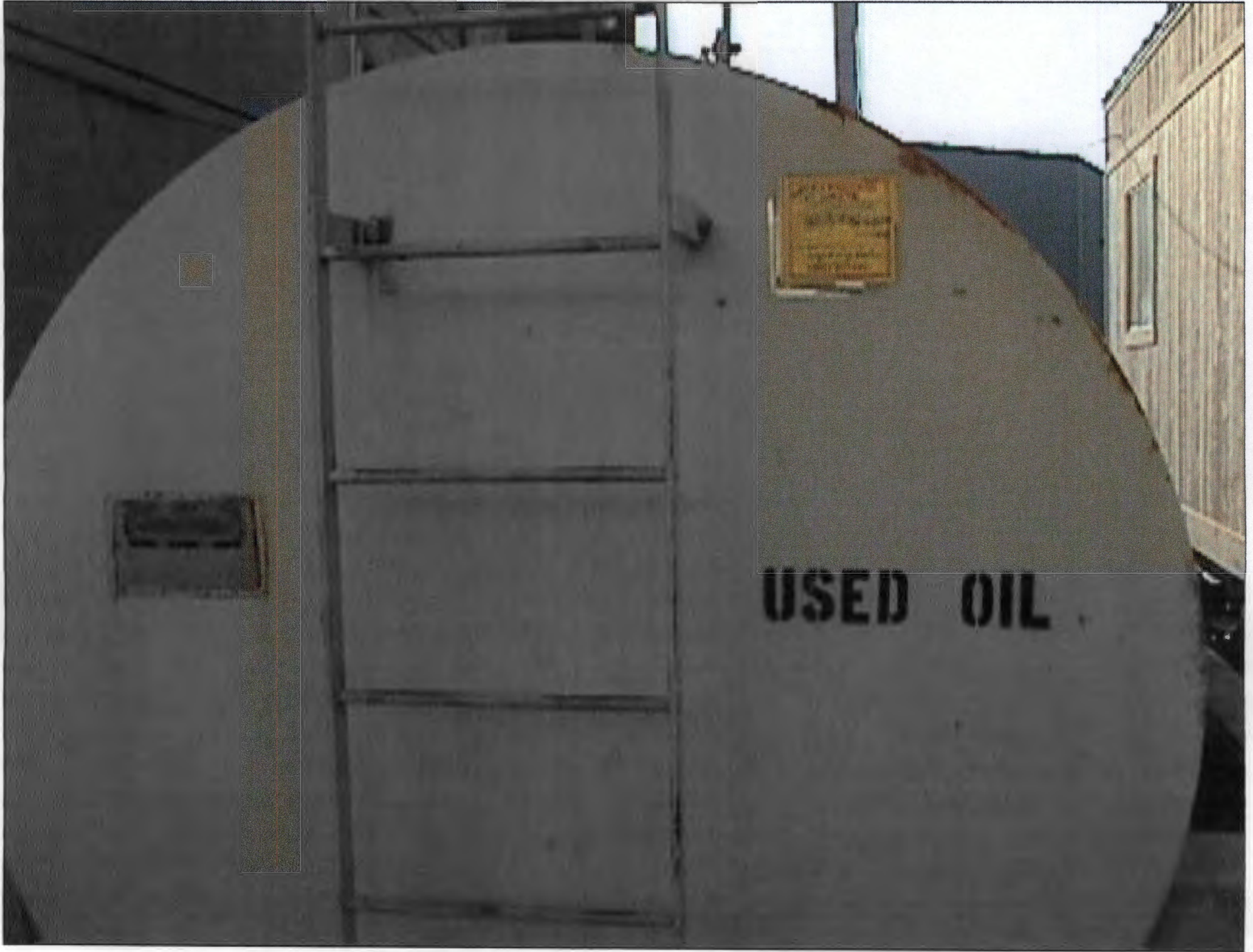
Selecting Maintenance Satellite Storage Area



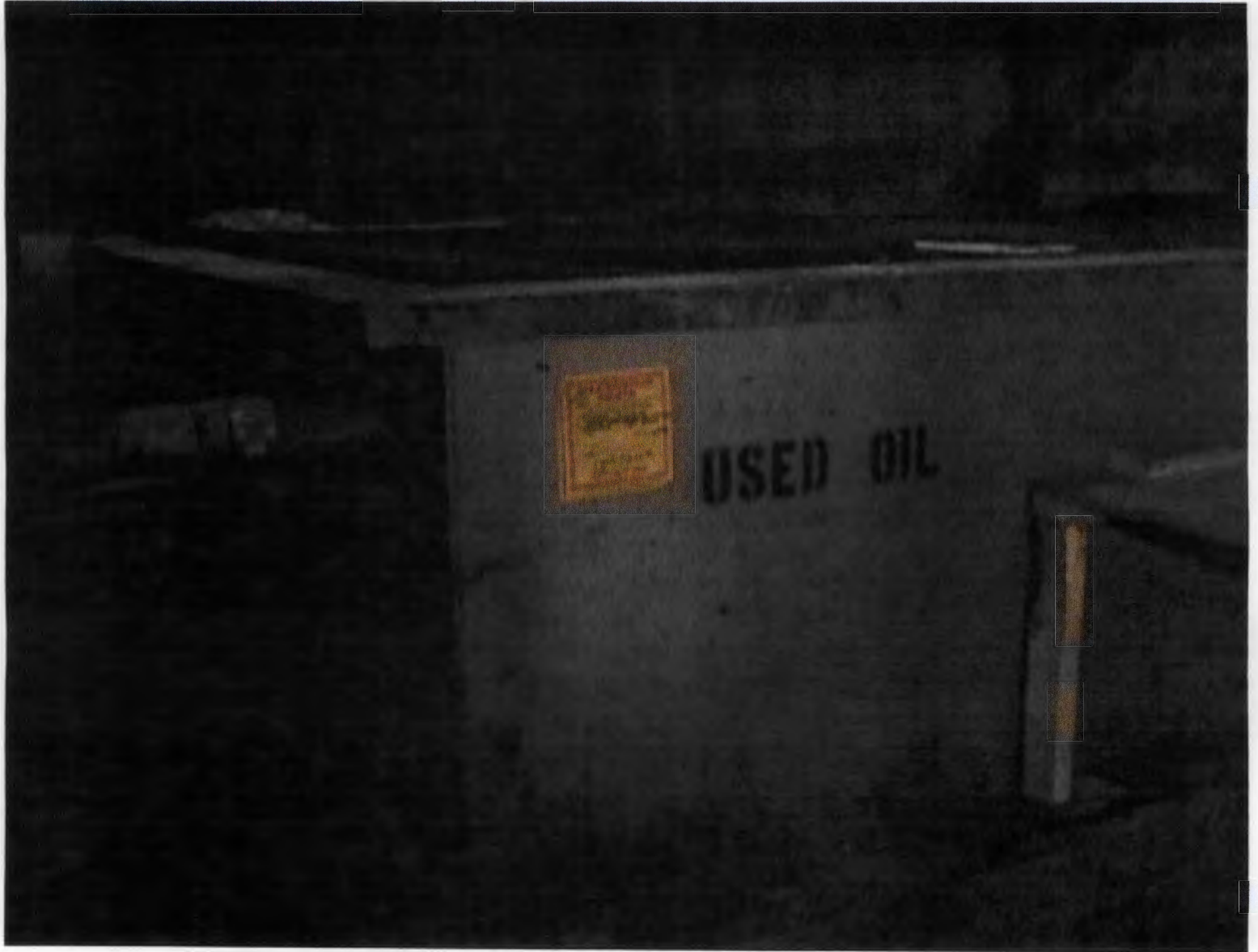
Oil Filter Container



Skim Pond Oil



Used Oil A-Sump Tank



Used Oil D-Sump Tank



ATTACHMENT 3

Material Safety Data Sheet

North American Chemical Company

13200 Main Street
Trona, California 93562



**anhydrous
sodium
sulfate**

For more detailed information on the hazards of this product, write to the address above. Technical Information Bulletin is also available. For emergency information, telephone (619) 372-2291 any time.

PRODUCT IDENTIFICATION

Brand Name TRONA salt cake
..... TRONA anhydrous
..... sodium sulfate
Chemical Name Sodium sulfate
Common Name Salt cake
Formula Na_2SO_4
DOT Proper
Shipping Name Not applicable
DOT Hazard
Class Not applicable
DOT I.D. Number Not applicable
Reportable Quantity (RQ) Not applicable
CAS Number 7757-82-6

PHYSICAL AND CHEMICAL PROPERTIES

State Granular solid
Melting Point C 884
Boiling Point C Not applicable
Color White
Odor None
Bulk Density, lb/cu. ft 80 to 90
Weight Per Gallon Not applicable
Specific Gravity @ 20C Not applicable
Water Solubility, % By Wt. @ 20C 16.3
Flash Point And Method Not applicable
pH Not applicable

HAZARDOUS INGREDIENTS

Chemical Name	Common Name	CAS Number	Hazard
Sodium sulfate	Salt cake	7757-82-6	Mild irritant to eyes, nose, and skin and a strong cathartic.

PHYSICAL HAZARD INFORMATION

Explosive: No Upper Explosive Limit: Not applicable Lower Explosive Limit: Not applicable
Pyrophoric: No
Flammable: No Flammability Class: Not applicable
Combustible: No Organic Peroxide: No
Oxidizer: No Compressed Gas: No
Reactivity: Stable at ordinary and expected temperatures and pressures.

Incompatibilities: Aluminum powder and molten sodium sulfate has exploded.

Hazardous Decomposition: Molten sodium sulfate decomposes, evolving toxic sulfur oxides.

Conditions To Avoid: Temperatures at or above the melting point.

HEALTH INFORMATION

Precautionary Information: **CAUTION!** May cause irritation. May be harmful if swallowed.

Symptoms Of Exposure: Burning sensation in the eyes or nose, coughing or sneezing or rash on the skin.

Restrictive Medical Conditions: Skin disorders may be aggravated by the dehydrating action of this product. Gastrointestinal and kidney disorders may be aggravated by the cathartic action of this product.

PRIMARY ROUTE(S) OF ENTRY

Inhalation (breathing), eye and skin contact and ingestion (swallowing).

TOXICITY INFORMATION

This product is of low toxicity to humans; no lethal doses for humans were reported in the literature; Oral-mouse LD₅₀ 5989 mg/kg; lvn-mouse LDLo 1220 mg/kg.

EXPOSURE LIMITS

OSHA: Not established.

ACGIH: Not established.

Other: ACGIH nuisance dust TLV-TWA is 10 mg/m³ total dust or 5 mg/m³ respirable dust.

Reported As A Potential Carcinogen ☒ Not Applicable ☐ National Toxicology Program
Or Carcinogen ☐ OSHA ☐ International Agency For Research On Cancer

PRECAUTIONS FOR SAFE HANDLING AND USE

Avoid breathing dust.
Avoid contact with eyes and skin.
Use only with adequate ventilation.
Wash thoroughly after handling.

SPILL AND LEAK PROCEDURES

Soil Release: Shovel and sweep up into a container and reclaim for salvage value or dispose of at an industrial waste facility in accordance with federal, state and local regulations.

Water Spill: Disperse and dilute with water jets, propellers or other similar devices.

Air Spill: Let dust settle and dispose of as in Soil Release above.

Occupational Spill: Shovel and sweep up into a container. Reclaim for salvage value, or as permitted, small amounts may be washed to an industrial sewer.

RCRA Waste Number: Not applicable.

ENGINEERING CONTROLS AND PERSONAL PROTECTIVE EQUIPMENT

Ventilation: Use general dilution ventilation techniques.

Respirator: Use NIOSH/MSHA approved dust and mist respirator for exposure above the nuisance dust exposure limit.

Eye Protection: Safety glasses or vented safety goggles.

Gloves: No special requirements. Ordinary work gloves.

Clothing: No special requirements. Wear easily washable clothing. Change daily. Wash clothing before reuse.

Mr. John Verber, esq.

May 28, 1998

Page 2

If you have any questions or need clarifications on any of the items listed above, please contact Mr. David Bacharowski at (213) 266-7546, or Mr. Rick Vergets at (213) 266-7556. You may also contact USEPA's project managers, Mr. Steve Linder at (415) 744-2036 or Mr. Sean Condry at (415) 744-2112 regarding technical issues. Please contact Mr. Jorge Leon at (916) 657-2428 or Ms. Laurie Williams at (415) 744-1387 with respect to any legal issues. We look forward to working with you.

Sincerely,

DAVID A. BACHAROWSKI
Environmental Program Manager
Regional Water Quality Control Board
Los Angeles Region

SEAN T. CONDRY
Project Manager
Waste Management Division
U.S. EPA Region 9

cc: Jorge Leon, Office of Chief Counsel, SWRCB
David Spath, Division of Drinking Water and Environmental Management,
State Department of Health Services
Gary Yamamoto, Drinking Water Field Operations, State Dept. of Health Services
Steve Linder, United States Environmental Protection Agency
Laurie Williams, United States Environmental Protection Agency
Carl Sjoberg, Environmental Programs Division, Los Angeles County Department of
Public Works
Capt. Dennis Wilcox, Underground Storage Tank Program, City of Los Angeles Fire
Dept.
Keith Pritsker, City Attorney's Office, City of Los Angeles
Walter Crone, Ninyo & Moore
Michael Schwennesen, Ecology and Environment, Inc.
Craig Perkins, Environmental & Public Works, City of Santa Monica
Joseph Lawrence, Assistant City Attorney, City of Santa Monica
Rey Rodriguez, Utilities Engineer, City of Santa Monica
Brian Johnson, Underground Storage Tank Program, City of Santa Monica
Barry Groveman, Special Environmental Counsel for City of Santa Monica
Denise Kruger, Southern California Water Company
Rob Saperstein, Counsel for Southern California Water Company
Toby Moore, Mission Geoscience
Angelo Bellomo, Environmental Strategies Corporation
Gino Bianchi-Mosquera, Geomatrix Consultants, Incorporated
Brad Boschetto, Shell Oil Company
Adam Leiter, Wayne Perry, Inc.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Hank Wigel, Plant Engineer
Owens-Brockway
3600 Alameda Avenue
Oakland, CA 94601

4a. Article Number

P 27# 218 184

4b. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Registered | <input checked="" type="checkbox"/> Certified |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Insured |
| <input type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> COD |

7. Date of Delivery

6-19-98

5. Received By: (Print Name)

JOHN GALLIOWAY

6. Signature: (Addressee or Agent)

X John G. Galloway

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

Clint Seiter (rust-3-1)
U.S. EPA, Region 9
75 Hawthorne St.
San Francisco CA 94105



DRAFT

CERTIFIED MAIL NO.
RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION

In reply, refer to WST-3-1

Hank Wiegel, Plant Engineer
Owens-Brockway
3600 Alameda Ave
Oakland, CA 94601

Dear Mr. Wiegel

On April 9, 1998, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA) at Owens-Brockway Glass Containers at 3600 Alameda Ave., Oakland, CA, U.S. EPA Identification Number CAT000618918. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U.S.C. 6927]. A copy of the investigation report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with RCRA regulations and potential violations of the California authorized program under RCRA Subtitle C. Any omissions in the report shall not be construed as a determination of compliance with applicable regulations.

1. Title 22 §66265.16(d) lists the following four requirements for adequate facility training records:

- a. the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;**
- b. a written job description for each position listed.**
- c. a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed.**
- d. records that document that the training or job experience required has been given to, and completed by, facility personnel.**

The training documentation you subsequently provided to EPA on April 16, 1998 does not conform to these four requirements. Please resubmit facility training records that conform to these requirements within 30 days of receipt of this letter.

Pursuant to U.S. EPA's Federal Facilities Compliance Strategy and Executive Order 12088, this letter and enclosure require you to correct the identified areas of noncompliance and to submit documentation of their correction to U.S. EPA within 30 calendar days of your receipt of this letter. Your response must include a letter signed by a duly authorized official of your facility, certifying correction of the identified areas of noncompliance. Documentation of your return to compliance may consist of, among other things, photographs, manifests and revised records. Where compliance cannot be achieved within 30 days, you must provide the reasons for the delay, a description of each corrective action planned and a schedule on which each corrective action will be taken.

By copy of this letter, U.S. EPA is providing the State of California with notice of the referenced violations of Subtitle C of RCRA. U.S. EPA is also providing the State with notice that it may take appropriate enforcement action if the facility does not resolve the violations within the time specified above and the State does not take appropriate enforcement action. The State of California may notify U.S. EPA of its intent to assume or decline responsibility to take such action to resolve the referenced violations.

U.S. EPA reserves the right to take further enforcement action as it deems appropriate, in accordance with the Federal Facility Compliance Strategy and Executive Order 12088. However, your response to this letter will be considered in determining the need for further enforcement action. Violations of Subtitle C of RCRA such as those listed in the enclosed report may also be punishable by criminal actions, as provided by Section 3008 of RCRA.

U.S. EPA routinely provides copies of investigation reports to State agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fifteen (15) working days from your receipt of this letter. U.S. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

Your response to this Notice of Violation, due within 30 days of your receipt of this letter, shall be mailed to:

Clint Seiter WST-3-1
Waste Compliance Branch
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

If you have questions related to technical aspects of the investigation report or this letter,

please contact Mr. Seiter at (415) 744-2141.

Sincerely,

Arlene Kabei, Chief
Compliance Monitoring and
Enforcement Section

cc: Paula Rasmussen, Reg. 4
Hernan Gomez, Oakland Fire Services

bc: Elaine Schimmel
Reading File H-4-1

ATTACHMENT 1 - PHOTOS

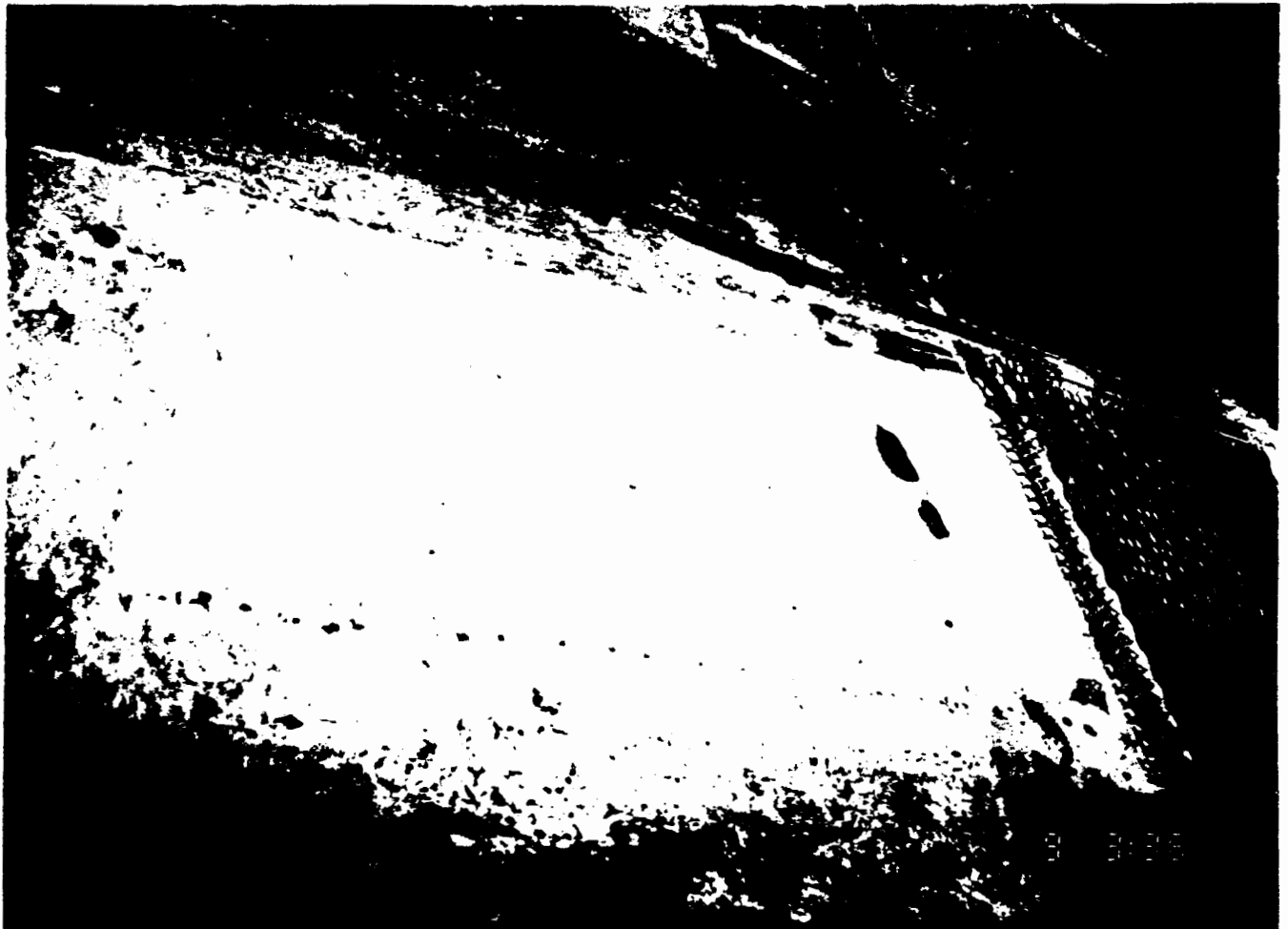


Photo #1- Salt cake deposits on ground in material offloading area

ATTACHMENT 1 - PHOTOS



Photo #2 - Cullet bin

ATTACHMENT 1 - PHOTOS

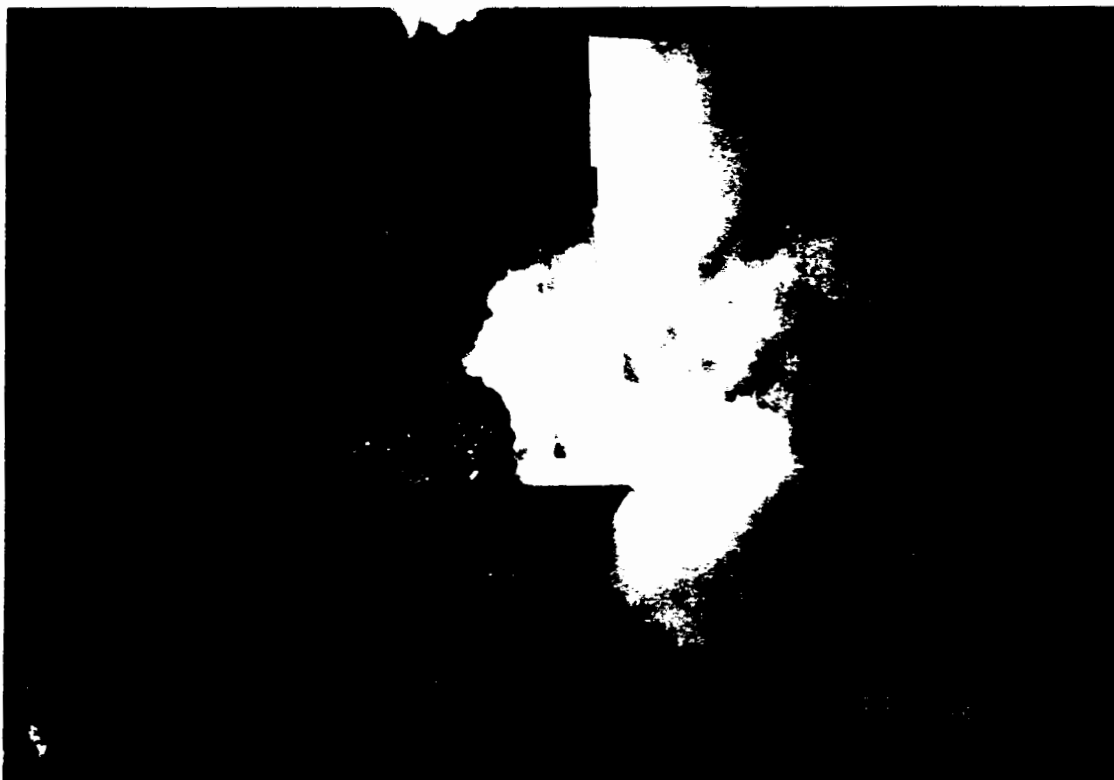


Photo #3 - Hot glass quench water vat

ATTACHMENT 1 - PHOTOS



Photo #4 - Oily wastewater skim pond

ATTACHMENT 1 - PHOTOS

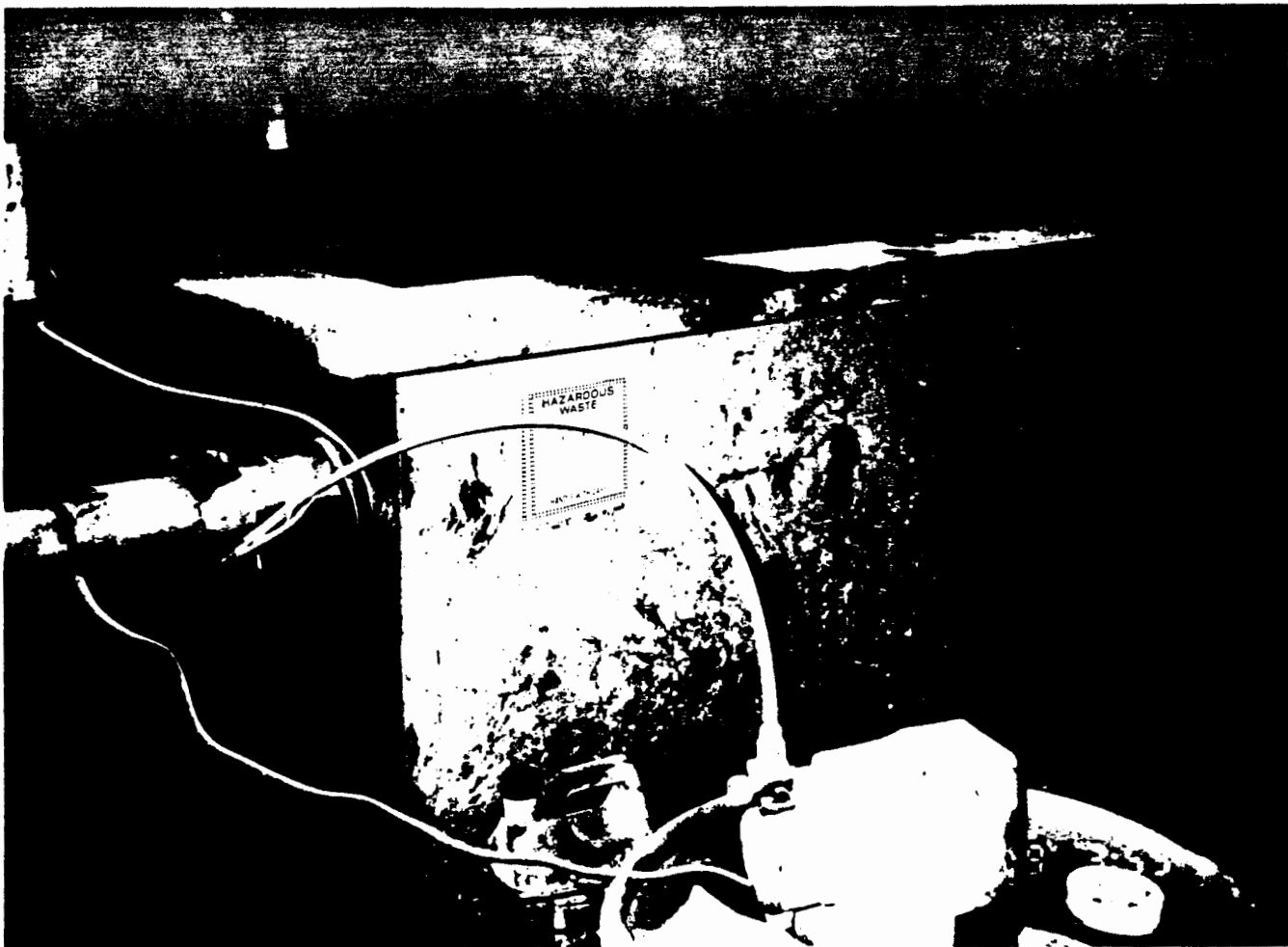


Photo #5 - Concrete used oil tank #1

ATTACHMENT 1 - PHOTOS



Photo #6 - Concrete used oil tank #2

ATTACHMENT 1 - PHOTOS

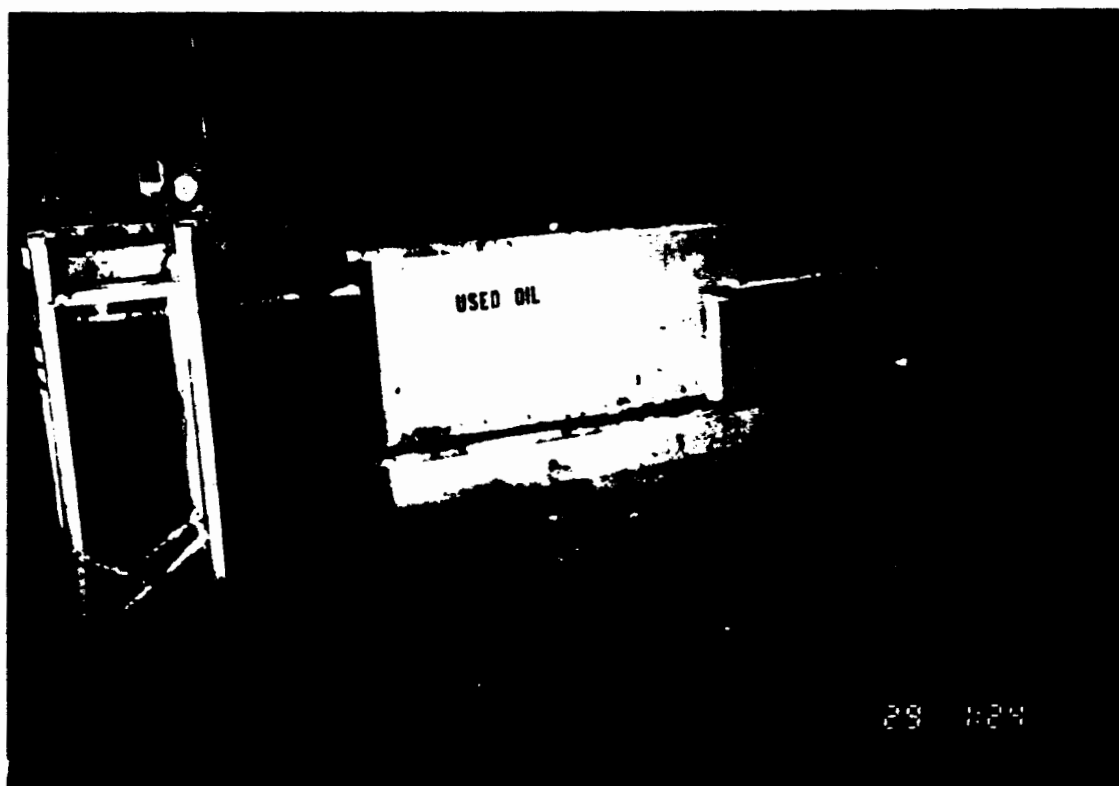


Photo #7 - Basement used oil tank, showing elevation above floor

ATTACHMENT 1 - PHOTOS

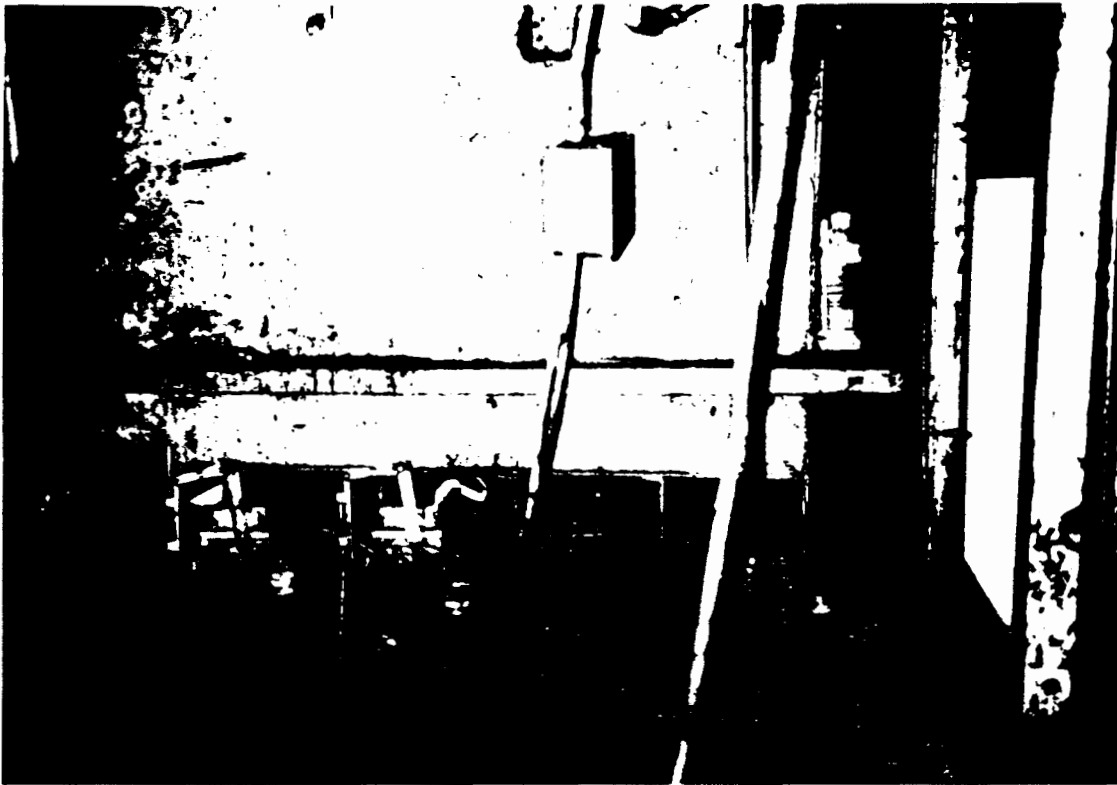


Photo #8 - Basement used oil tank, close-up of elevation above floor

ATTACHMENT 1 - PHOTOS



Photo #9 - Skim sump next to used oil tank

ATTACHMENT 1 - PHOTOS

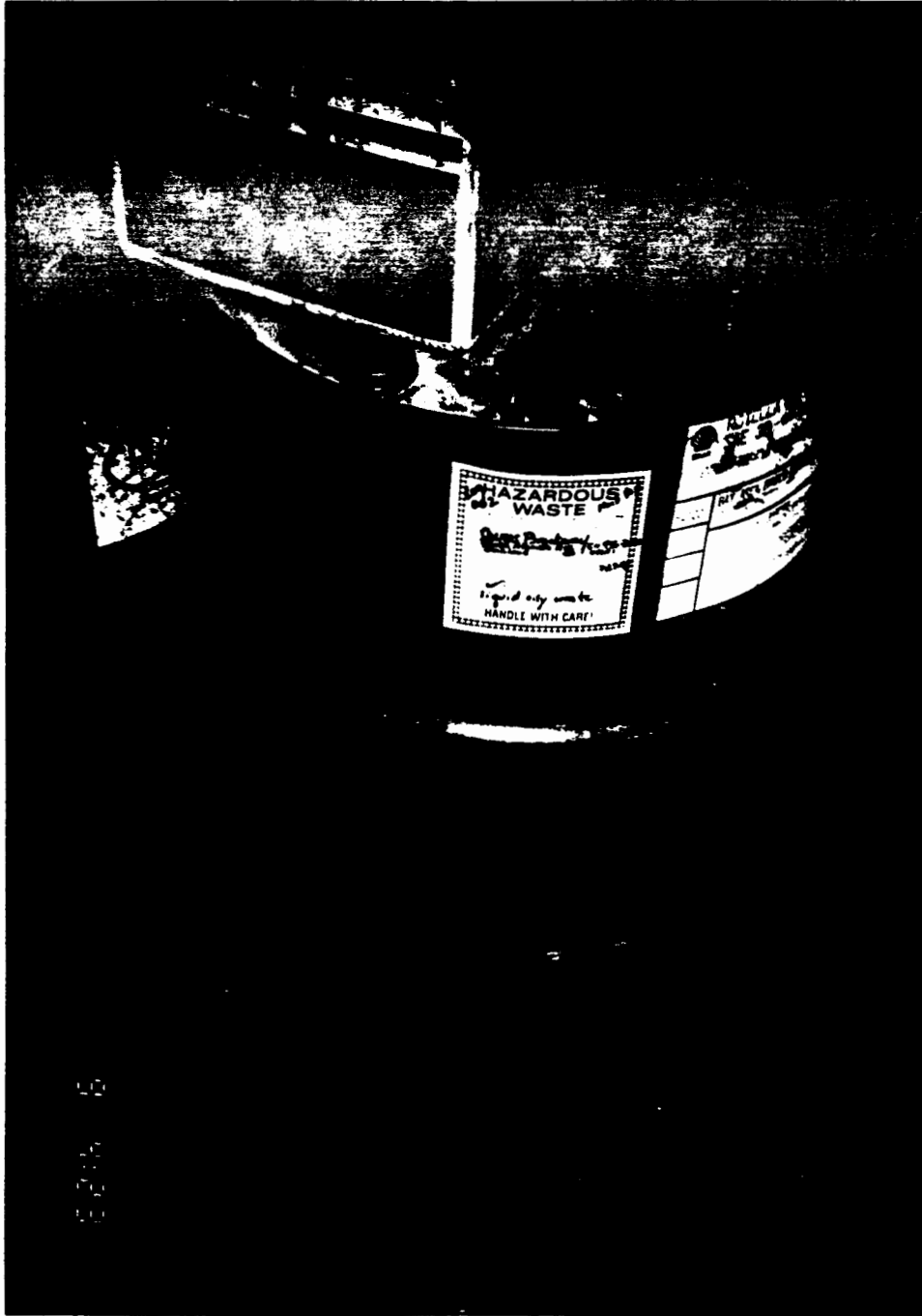


Photo #10 - Used oil drum (unmarked with the words "Used Oil") in satellite accumulation area in the Machine Repair Shop.

ATTACHMENT 1 - PHOTOS

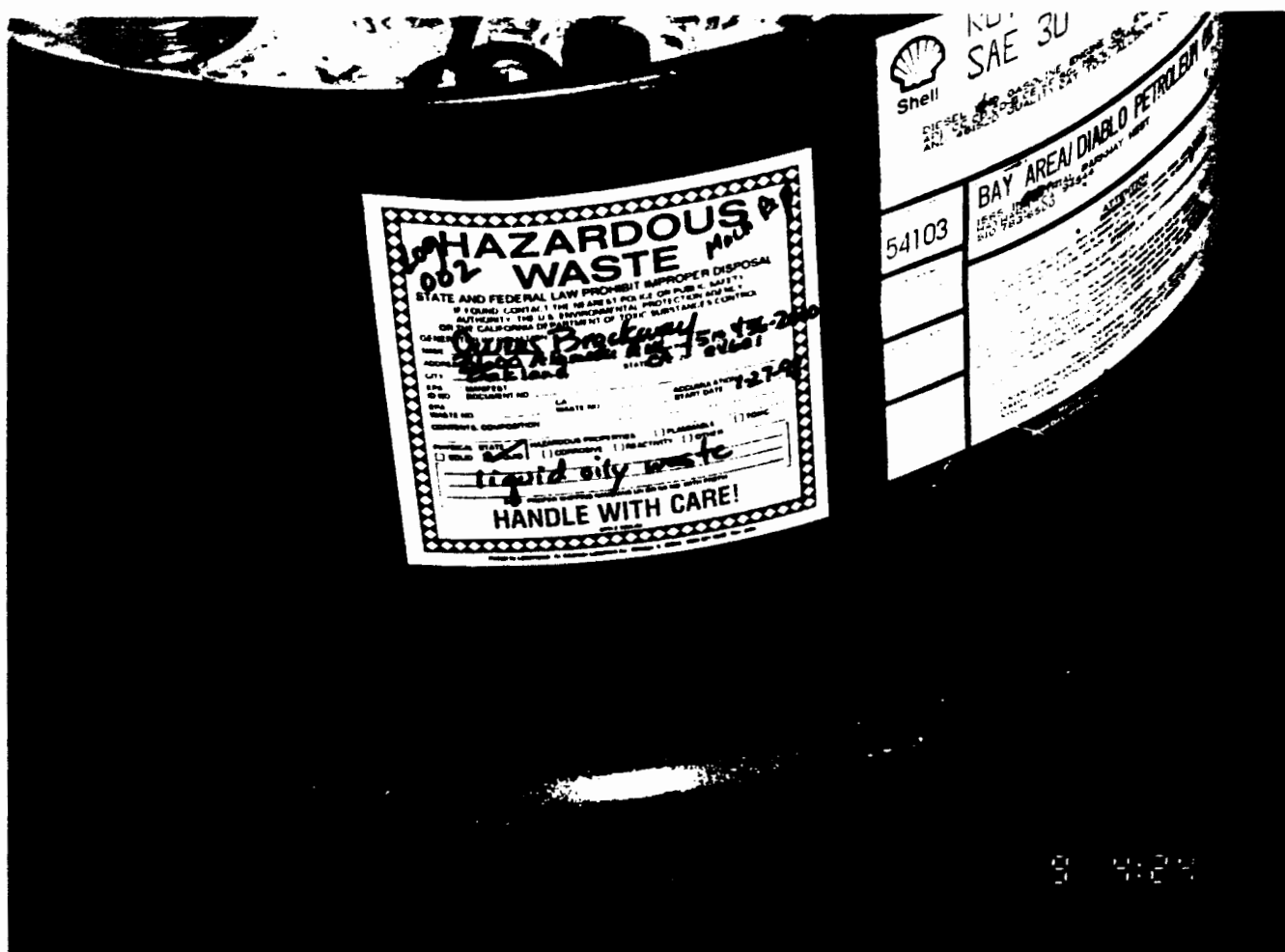


Photo #11 - Closeup of label of used oil drum in satellite accumulation area in the Machine Repair Shop.

ATTACHMENT 1 - PHOTOS



Photo #12 - Used oil drum (unmarked with words "Used Oil") in Satellite Accumulation Area, Selecting Maintenance Shop

ATTACHMENT 1 - PHOTOS



Photo #13 - Used oil drum (unmarked with words "Used Oil") in Satellite Accumulation Area, Forklift Maintenance Shop

ATTACHMENT 1 - PHOTOS

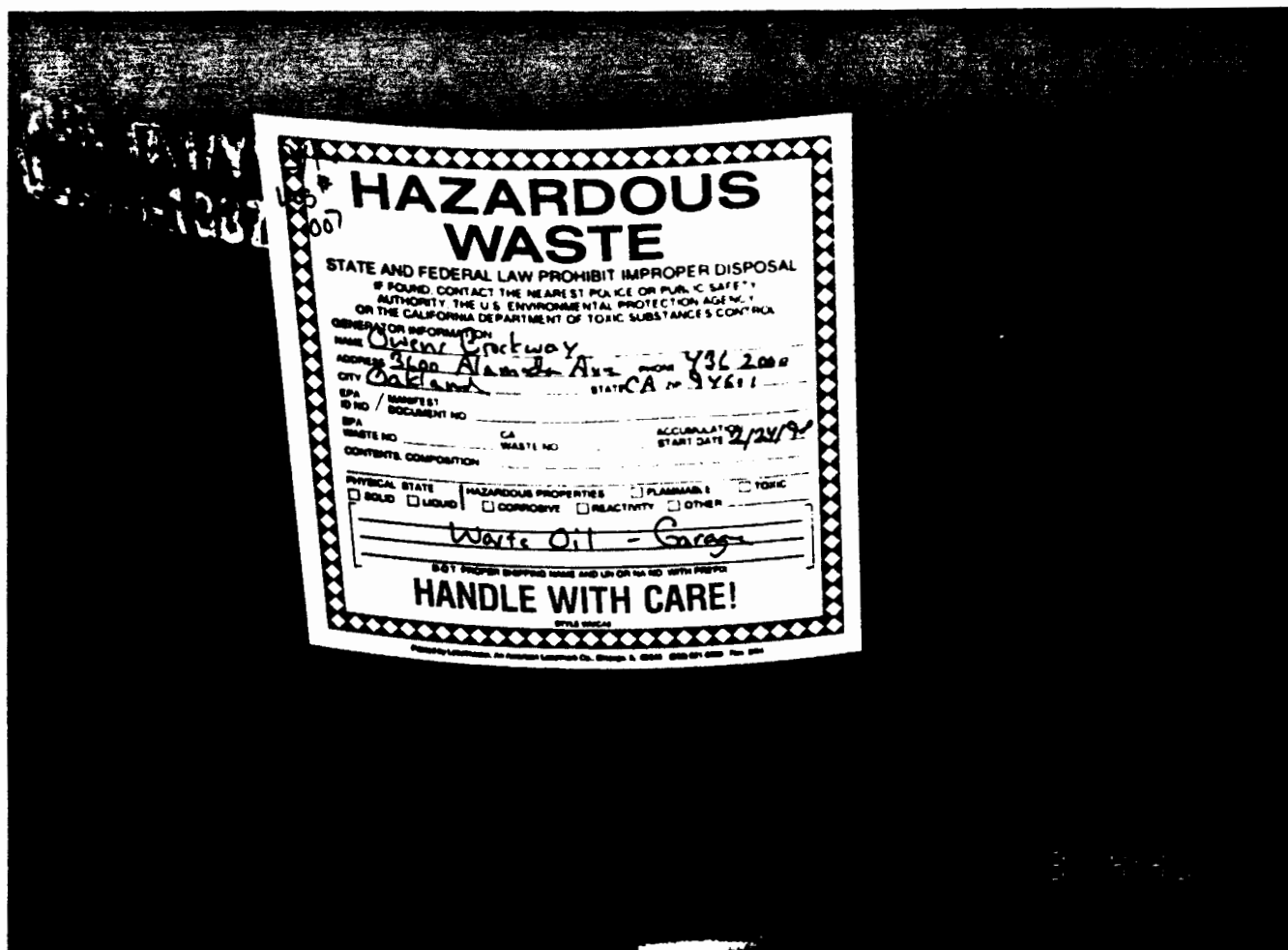


Photo #14 - Closeup of label on used oil drum in Satellite Accumulation Area, Forklift Maintenance Shop

ATTACHMENT 1 - PHOTOS

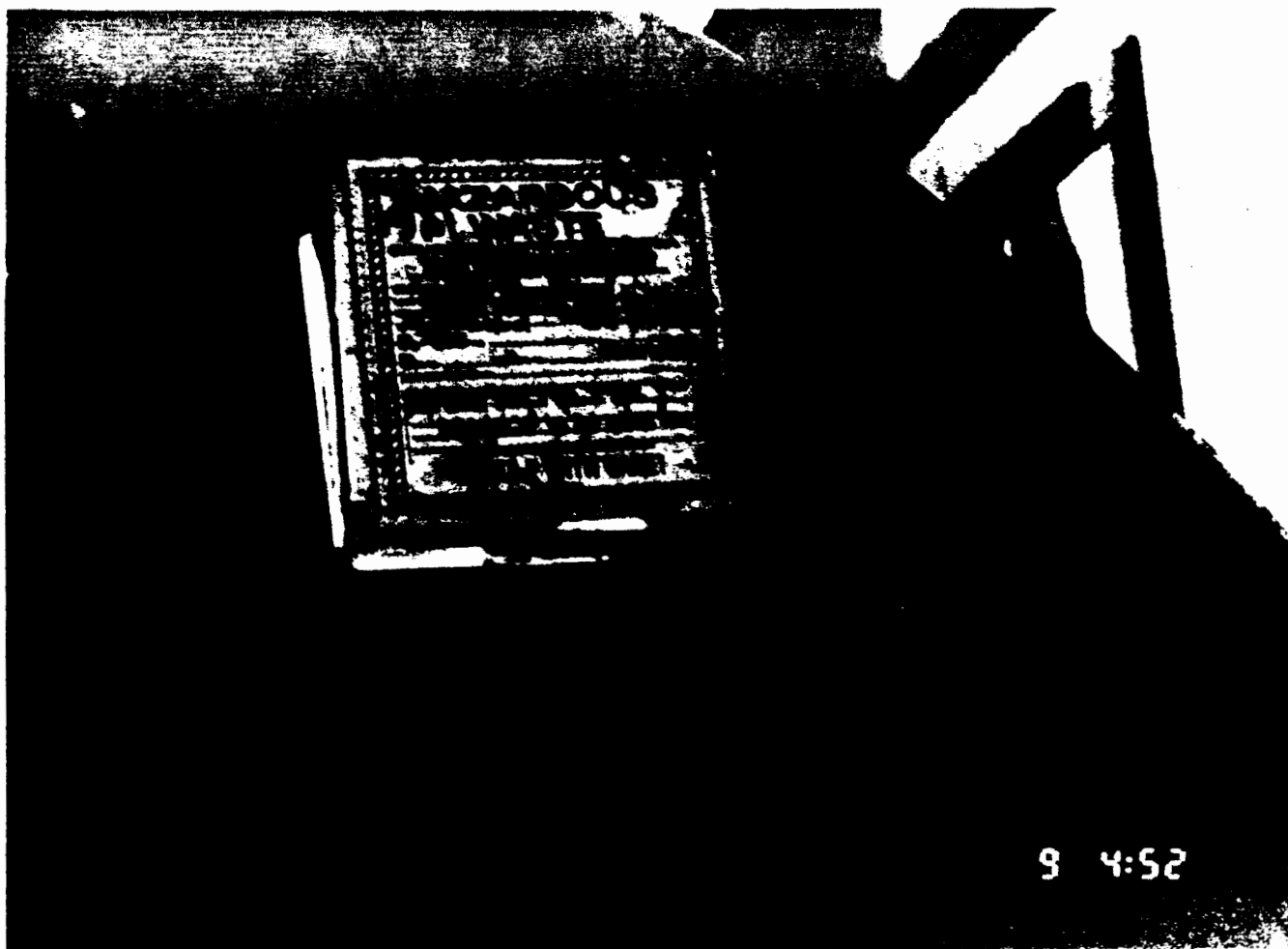
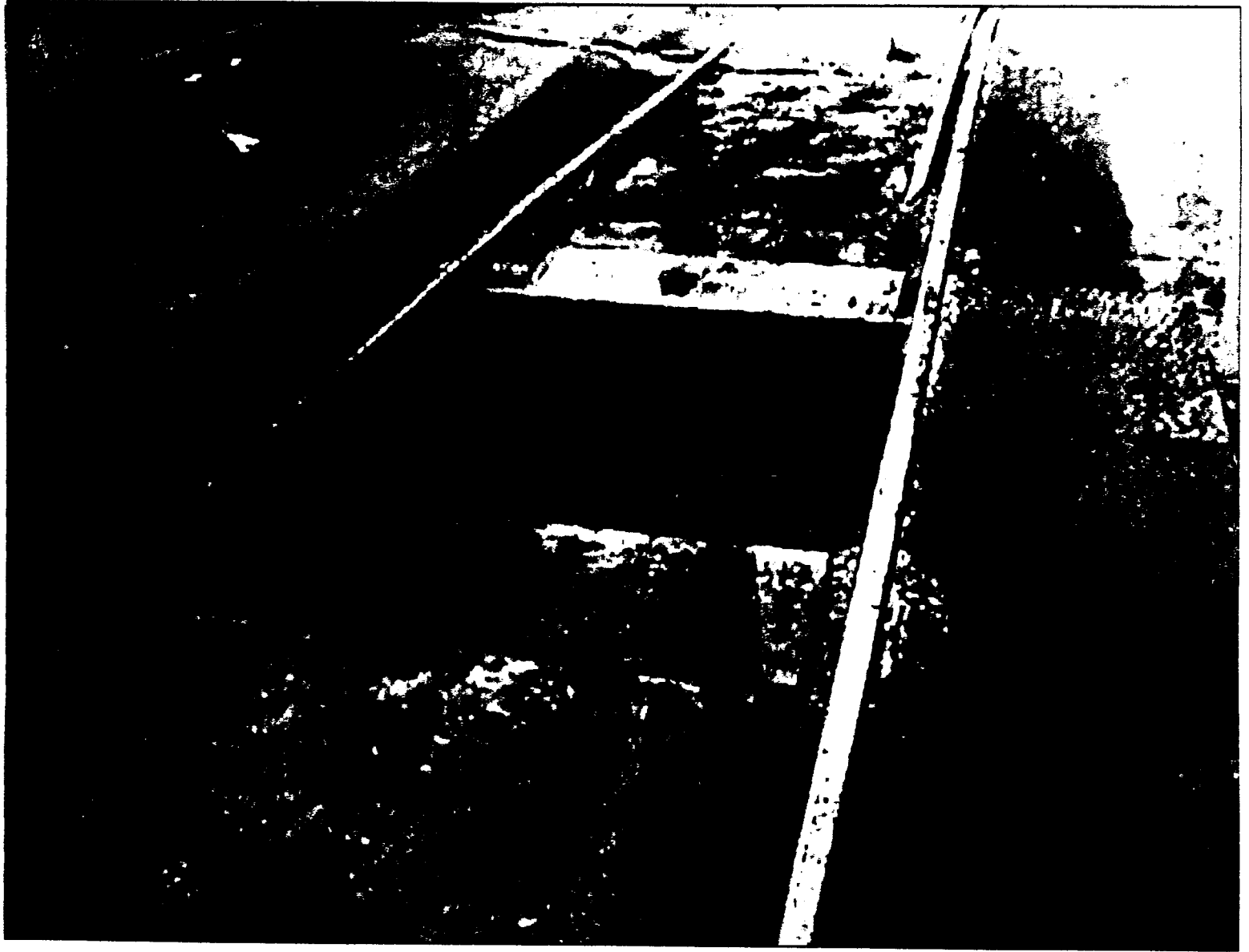
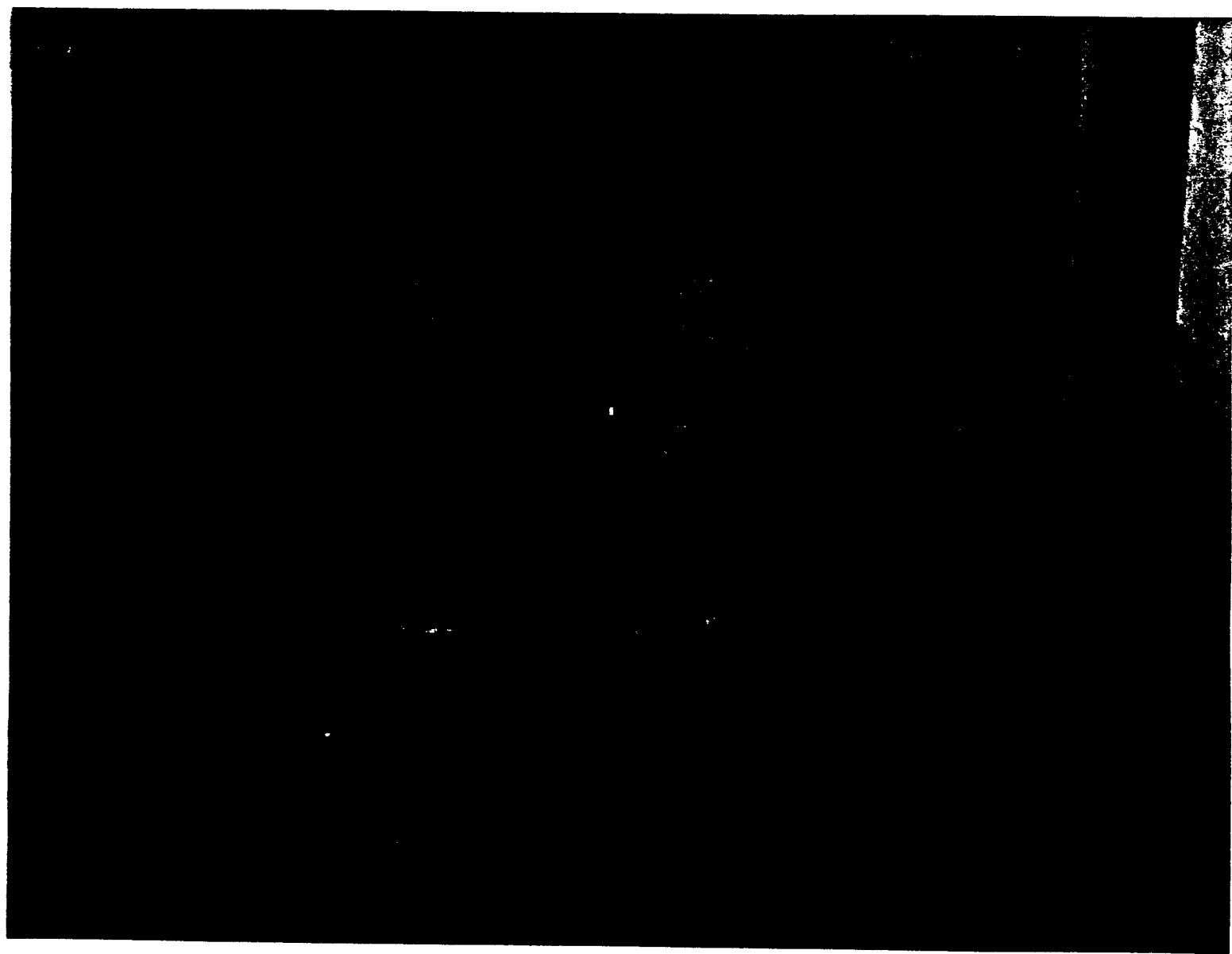


Photo #15 - Exterior 4000 Gallon Above-Ground Used Oil Tank, unmarked with the words "Used Oil".

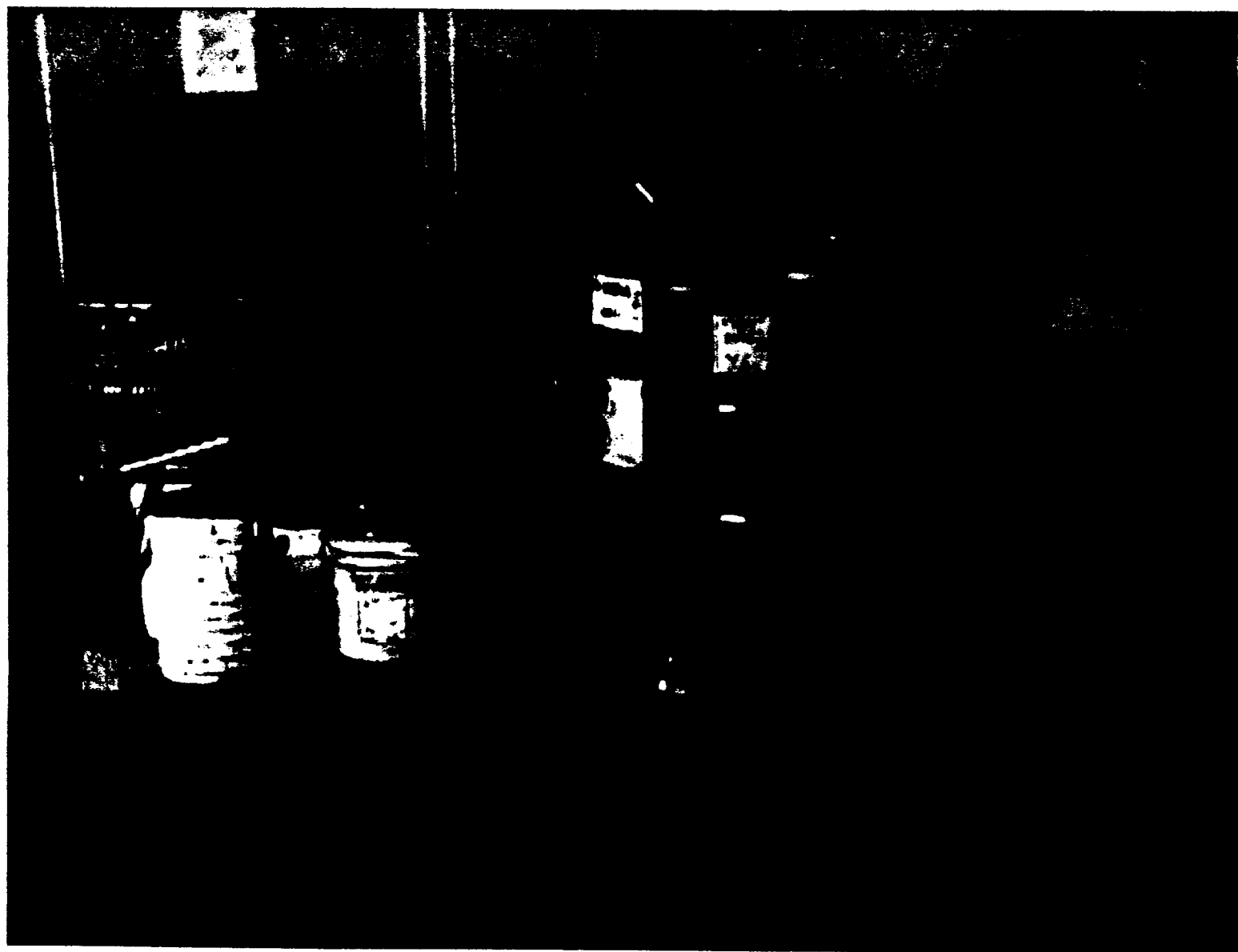
ATTACHMENT 2

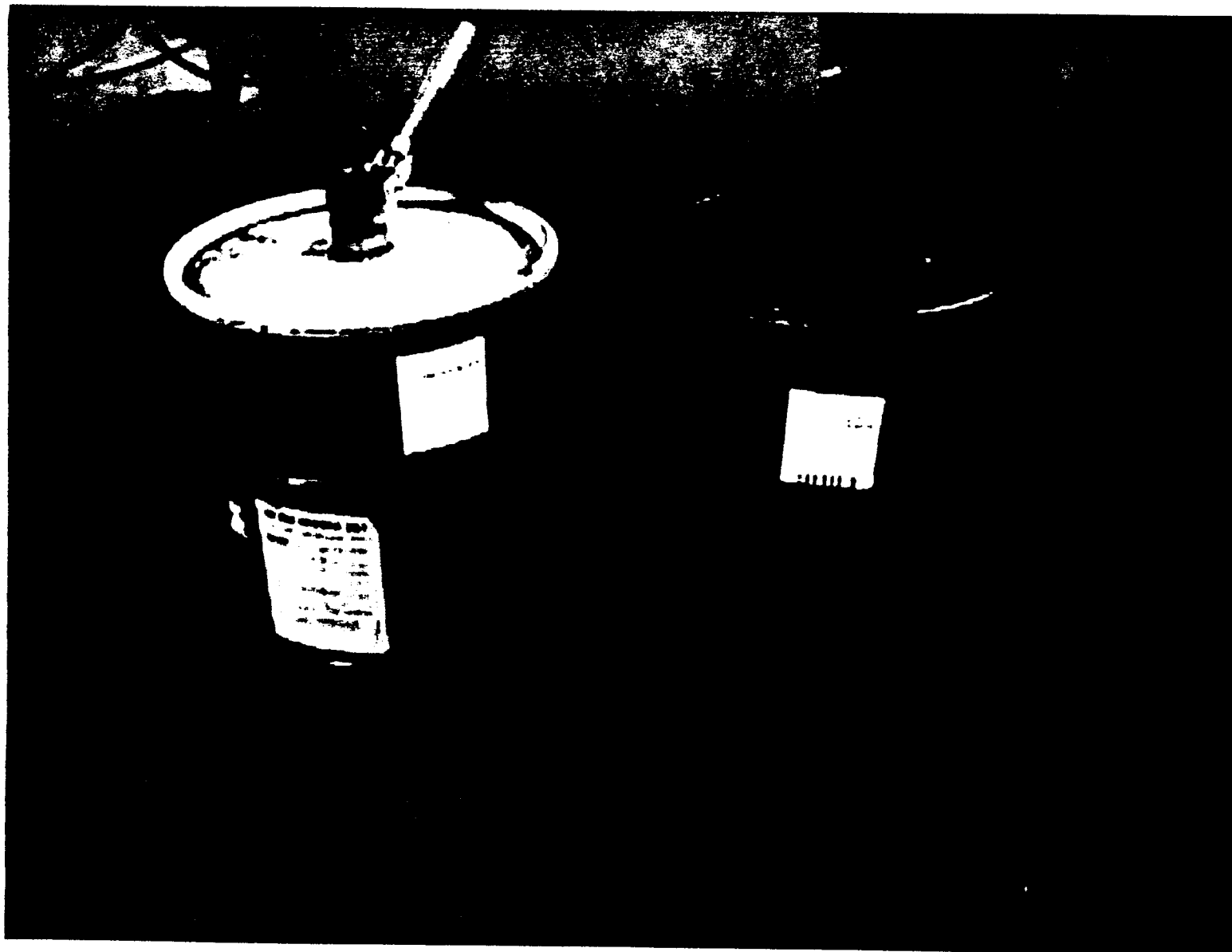




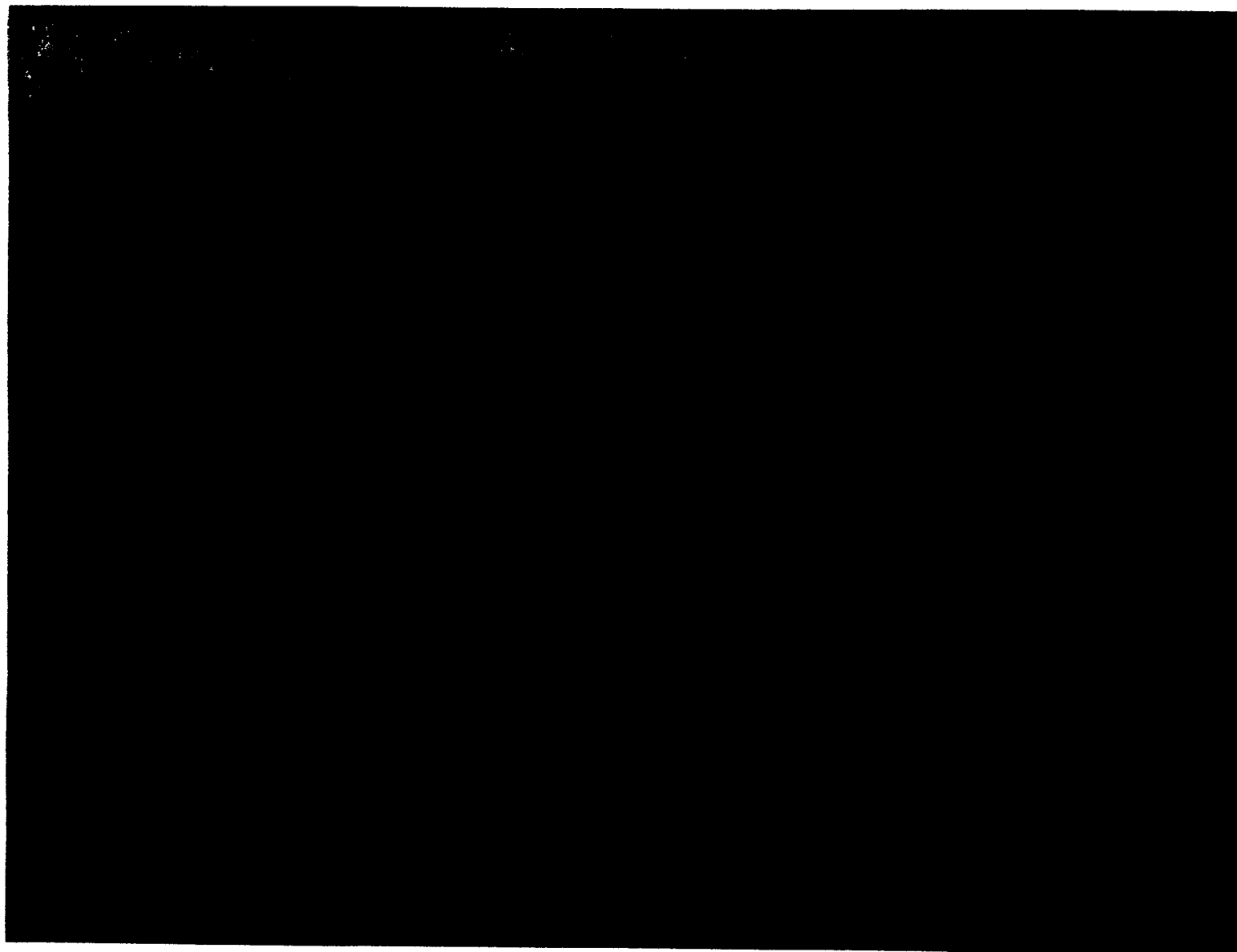














ATTACHMENT 3

Material Safety Data Sheet



**anhydrous
sodium
sulfate**

North American Chemical Company

13200 Main Street
Trona, California 93562

For more detailed information on the hazards of this product, write to the address above. Technical Information Bulletin is also available. For emergency information, telephone (819) 372-2291 any time.

PRODUCT IDENTIFICATION

Brand Name TRONA salt cake
 TRONA anhydrous
 sodium sulfate
Chemical Name Sodium sulfate
Common Name Salt cake
Formula Na_2SO_4
DOT Proper
Shipping Name Not applicable
DOT Hazard
Class Not applicable
DOT I.D. Number Not applicable
Reportable Quantity (RQ) .. Not applicable
CAS Number 7757-82-6

PHYSICAL AND CHEMICAL PROPERTIES

State Granular solid
Melting Point C 884
Boiling Point C Not applicable
Color White
Odor None
Bulk Density, lb/cu. ft 80 to 90
Weight Per Gallon Not applicable
Specific Gravity @ 20C Not applicable
Water Solubility, % By Wt. @ 20C .. 16.3
Flash Point And Method Not applicable
pH Not applicable

HAZARDOUS INGREDIENTS

Chemical Name	Common Name	CAS Number	Hazard
Sodium sulfate	Salt cake	7757-82-6	Mild irritant to eyes, nose, and skin and a strong cathartic.

PHYSICAL HAZARD INFORMATION

Explosive: No Upper Explosive Limit: Not applicable Lower Explosive Limit: Not applicable
Pyrophoric: No
Flammable: No Flammability Class: Not applicable
Combustible: No Organic Peroxide: No
Oxidizer: No Compressed Gas: No
Reactivity: Stable at ordinary and expected temperatures and pressures.

Incompatibilities: Aluminum powder and molten sodium sulfate has exploded.

Hazardous Molten sodium sulfate decomposes, evolving toxic sulfur oxides.
Decomposition:

Conditions Temperatures at or above the melting point.
To Avoid:

HEALTH INFORMATION

Precautionary Information: CAUTION! May cause irritation. May be harmful if swallowed.

Symptoms Of Exposure: Burning sensation in the eyes or nose, coughing or sneezing or rash on the skin.

**Restrictive Medical
Conditions:**

Skin disorders may be aggravated by the dehydrating action of this product.
Gastrointestinal and kidney disorders may be aggravated by the cathartic action of this product.

PRIMARY ROUTE(S) OF ENTRY

Inhalation (breathing), eye and skin contact and ingestion (swallowing).

TOXICITY INFORMATION

This product is of low toxicity to humans; no lethal doses for humans were reported in the literature; Oral-mouse LD_{50} 5969 mg/kg; Ivn-mouse $LDLo$ 1220 mg/kg.

EXPOSURE LIMITS

OSHA: Not established.

ACGIH: Not established.

Other: ACGIH nuisance dust TLV-TWA is 10 mg/m^3 total dust or 5 mg/m^3 respirable dust.

Reported As A Potential Carcinogen
Or Carcinogen

☒ Not Applicable
☐ OSHA

☐ National Toxicology Program
☐ International Agency For Research On Cancer

PRECAUTIONS FOR SAFE HANDLING AND USE

Avoid breathing dust.
Avoid contact with eyes and skin.
Use only with adequate ventilation.
Wash thoroughly after handling.

SPILL AND LEAK PROCEDURES

Soil Release: Shovel and sweep up into a container and reclaim for salvage value or dispose of at an industrial waste facility in accordance with federal, state and local regulations.

Water Spill: Disperse and dilute with water jets, propellers or other similar devices.

Air Spill: Let dust settle and dispose of as in Soil Release above.

Occupational Spill: Shovel and sweep up into a container. Reclaim for salvage value, or as permitted, small amounts may be washed to an industrial sewer.

RCRA Waste Number: Not applicable.

ENGINEERING CONTROLS AND PERSONAL PROTECTIVE EQUIPMENT

Ventilation: Use general dilution ventilation techniques.

Respirator: Use NIOSH/MSHA approved dust and mist respirator for exposure above the nuisance dust exposure limit.

Eye Protection: Safety glasses or vented safety goggles.

Gloves: No special requirements. Ordinary work gloves.

Clothing: No special requirements. Wear easily washable clothing. Change daily. Wash clothing before reuse.

If you have any questions or need clarifications on any of the items listed above, please contact Mr. David Bacharowski at (213) 266-7546, or Mr. Rick Vergets at (213) 266-7556. You may also contact USEPA's project managers, Mr. Steve Linder at (415) 744-2036 or Mr. Sean Condry at (415) 744-2112 regarding technical issues. Please contact Mr. Jorge Leon at (916) 657-2428 or Ms. Laurie Williams at (415) 744-1387 with respect to any legal issues. We look forward to working with you.

Sincerely,

DAVID A. BACHAROWSKI
Environmental Program Manager
Regional Water Quality Control Board
Los Angeles Region

SEAN T. CONDRY
Project Manager
Waste Management Division
U.S. EPA Region 9

cc: Jorge Leon, Office of Chief Counsel, SWRCB
David Spath, Division of Drinking Water and Environmental Management,
State Department of Health Services
Gary Yamamoto, Drinking Water Field Operations, State Dept. of Health Services
Steve Linder, United States Environmental Protection Agency
Laurie Williams, United States Environmental Protection Agency
Carl Sjoberg, Environmental Programs Division, Los Angeles County Department of
Public Works
Capt. Dennis Wilcox, Underground Storage Tank Program, City of Los Angeles Fire
Dept.
Keith Pritsker, City Attorney's Office, City of Los Angeles
Walter Crone, Ninyo & Moore
Michael Schwennesen, Ecology and Environment, Inc.
Craig Perkins, Environmental & Public Works, City of Santa Monica
Joseph Lawrence, Assistant City Attorney, City of Santa Monica
Rey Rodriguez, Utilities Engineer, City of Santa Monica
Brian Johnson, Underground Storage Tank Program, City of Santa Monica
Barry Groveman, Special Environmental Counsel for City of Santa Monica
Denise Kruger, Southern California Water Company
Rob Saperstein, Counsel for Southern California Water Company
Toby Moore, Mission Geoscience
Angelo Bellomo, Environmental Strategies Corporation
Gino Bianchi-Mosquera, Geomatrix Consultants, Incorporated
Brad Boschetto, Shell Oil Company
Adam Leiter, Wayne Perry, Inc.

ATTENDEE LIST

HAZARDOUS WASTE TRAINING

DATE: 7/24/98 PLANT: Oakland INSTRUCTOR: B. Neal

SUBJECTS COVERED: Definitions, Typical Wastes, Satellite Accum, Gen. Waste Mgt.,
Costs, Spills, etc. <See Agenda>

<u>NAME (print)</u>	<u>SIGNATURE</u>	<u>JOB TITLE</u>
1. Bob Neal	Robert C. Neal	Enviro. Administrator
2. Tom MAHONEY	Tom Mahoney	Maint. Mech.
3. Virgil HENLEY	Virgil Henley	Maint. ^{Sup} Supervisor
4. DON CLARK	Don Clark	MAINT MECH.
5. PHIL HORD		
6. Ray Williams	Ray L. Williams	MAINT.
7. Mel Serafini	Mel Serafini	maint.
8. GARY PERCIE	Gary Percie	MOLD REP. SUPV.
9. LARRY BERTAND	Larry Bertand	MAINT
10. Casey, CORLESS	Corless, Casey	MAINT
11. JOHN ALAMILLO	John D. Alamillo	MACHINE REPAIR
12. JAVIER MORALES	Juan A. Morales	MAINT.
13. Michael Flentroy	Michael Flentroy	MAINT
14. Pedro Xavier	Pedro Xavier	Freeing Station
15. ROMEO M. BINONGCAL	Rommel	SECT. MAINT.
16.		
17.		

ATTENDEE LIST

HAZARDOUS WASTE TRAINING

DATE: 8/11/98 PLANT: Oakland INSTRUCTOR: B. Neal

SUBJECTS COVERED: Background, Typical H/Ws, Plant Jobs, Spills
<See Attached Handout Used>

<u>NAME (print)</u>	<u>SIGNATURE</u>	<u>JOB TITLE</u>
1. Bob Neal	Robert C. Neal	Enviro. Administrator
2. DAVID BURNIGHT	David Burnight	MANIT. MAC.
3. William DeLong	William J. DeLong	MANIT.
4.		
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ATTENDEE LIST

HAZARDOUS WASTE TRAINING

DATE: 7/23/98 PLANT: Oakland INSTRUCTOR: B. Neal

SUBJECTS COVERED: Background H.W., Satellite Accum., Gen. H.W. Mgt. Requirements
Inspections, Costs, Spill Response,
<See Attached Outline>

<u>NAME (print)</u>	<u>SIGNATURE</u>	<u>JOB TITLE</u>
1. Bob Neal	<i>Robert C. Neal</i>	Enviro. Administrator
2. BOB DYER	<i>Lon Salmer</i>	MAINT MECH
3. RON SALMER	<i>Tim Holt</i>	BATCH MAINT C.L.
4. JIM HOLT	<i>Tim Holt</i>	MAINT MECH
5. LUIS GONZALEZ	<i>Vic Carlson</i>	MECHANIC
6. <i>Vic Carlson</i> VICTOR CARLSON	<i>Michael S. Burns</i>	MAINT
7. Michael S. Burns	<i>Henry Vallo Kull</i>	MAINT
8. HENRY V. RULL	<i>Jose E Morales</i>	MAINT MECH.
9. JOSE T MORALES	<i>Jaime Moreno</i>	B&F.
10. Jaime Moreno	<i>Hank Wiesel</i>	Plt. Eng.
11. HANK WIESEL		
12.		
13.		
14.		
15.		
16.		
17.		

DATE: 7/17/98

MEETING TOPIC: Hazardous Waste Training

NAME: (PLEASE PRINT YOUR NAME)	DEPARTMENT
1 Bob Neal	Environmental
2 Steve Springer	Plant Engineering
3 Jose Ramirez	
4 Jim Dwyer	MAINT
5 RICHARD TORRES	MAINT.
6 Richard W. Gray	SEL MAINT
7 JOHN BASLEE	BATCH
8 Rosilyn Morris	SEL MAINT
9 Philip Cobb	Storeroom
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HAZARDOUS WASTE MANAGEMENT TRAINING

1. DEFINITIONS What is a waste? When? Hazardous waste? Generator? Facility?

2. HAZARDOUS WASTES GENERATED BY GLASS PLANTS

- Waste oil ("Used Oil")
- Oil Filters and Antifreeze
- Coder Inks and Solvent (MEK)
- Parts washer solvents
- Contaminated Cullet and Sludge
- Oil contaminated solids
- Checker Dust (furnace repairs)
- Melter Bottom with Lead (furnace repairs)
- Asbestos
- Caustic

3. SATELLITE ACCUMULATION (Tasks of the H.W. Satellite Accumulator)

(Coder wastes and mobile equipment maintenance wastes)

- Must be located in the immediate area where the waste is generated.
- Must be under the direct supervision of the area supervisor(s).
- The accumulation area must be appropriately marked and kept clean.
- Must use proper containers.
- **CONTAINERS MUST BE LABELED PROPERLY.**
 - Must be marked "Hazardous Waste".
 - Must indicate the content. i.e. "Used Oil", "Oil filters", "MEK Solvent".
 - Must indicate the "satellite" accumulation start date.
- Use protective equipment (rubber gloves and safety glasses) when handling.
- Ensure that only the designated waste is added to the container.
- **CONTAINERS MUST BE CLOSED EXCEPT WHEN ADDING WASTE.**
- 55 gal. is the maximum waste volume allowed at a satellite accumulation site.
- One (1) year is the limit for accumulation at a satellite accumulation site.
- Requires notification of a "haz. waste handler" when the container is full so a replacement container can be provided and the full container removed.

4. GENERAL HAZARDOUS WASTE MANAGEMENT (Tasks of the H.W. Handler)

- Maintain the 90-day accumulation area for hazardous wastes.
- Ensure that proper containers are used and that they are closed and leak free.
- Ensure that containers bear the proper labels and contain required information.
- Ensure that wastes are shipped for disposal within 90 days of generation.
- Maintain current waste profiles at the disposal facilities of choice.
- Prepare manifests for waste shipments including proper waste and DOT information, certification signatures and attachments as required.
- Ensure that the waste load is secure and that proper placards are displayed.
- Ensure proper distribution and filing of waste manifests.
- Ensure that the disposal facility copy is returned within 35 days of shipment.
- Prepare and submit reports and fees as required by the regulatory agencies.
- Maintain the required training records.

5. HAZARDOUS WASTE INSPECTIONS (Tasks of the H.W. Inspector)

- Conducted weekly to ensure waste is accumulated only in the designated areas.
- Containers are checked to ensure they are closed, properly labeled and spill free.
- Accumulation dates are checked to ensure they do not exceed specified limits.
- Loading/unloading areas are checked to ensure they are free of spilled materials.
- Containment areas are checked for leaked material.
- Used oil accumulation facilities are checked for proper maintenance.
- Spill response equipment is checked.
- Housekeeping in accumulation areas and throughout the plant is checked.
- Inspections are documented. Inspection records must be retained for 3 years.
- Observed deficiencies are reported to the plant engineer for corrective action.

6. DISPOSAL COSTS

- Transportation and disposal costs vary widely for hazardous waste depending on the characteristics of the waste, treatment requirements and the disposal facility used. In general, the transportation cost for a truck load of waste to the facility most often used (CWM) is about \$1,000.
- Treatment and disposal costs for hazardous waste solids typically range from \$100 - 300/ton. The cost for some problem wastes can be as high as \$800/ton.
- Disposal of waste oil costs about \$3,000 per truck load. More if high solids.
- In general, haz. waste transportation and disposal costs \$4000-8,000/truck load.
- A drum of waste solvent may cost \$500 for disposal.

7. SPILL RESPONSE

- Small incidental spills typical during normal operation are handled by the user.
- Spills involving larger quantities of material which can be handled internally by plant personnel are handled by the Emergency Response Team.
- A spill which could impact the public or the environment or is beyond the response capabilities of designated plant employees is considered an emergency response. Emergency spill responses are handled by trained environmental response contractors or the local fire department.

8. MOST COMMON MISTAKES IN HAZARDOUS WASTE MANAGEMENT

(See attached sheet.)

9. REVIEW

OWENS-BROCKWAY

GLASS CONTAINERS
a unit of Owens-Illinois

August 12, 1998



Mr. Clint Seiter WST-3-1
Waste Compliance Branch
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

RE: Owens-Brockway Glass Container Inc.
3600 Alameda Ave.
Oakland, Calif. 94601
UST-3-1
Letter Dated June 17, 1998

Dear Mr. Seiter:

As a supplement to our previously submitted training records, we are adding this response.

We appreciate the additional time to conduct hazardous waste training during this heavy vacation season. With the plant's three shift operation, vacations and limited availability of our environmental administrator to conduct the training; achieving the desired training coverage has been difficult.

Since our discussion on July 7, 1998, we have completed four hazardous waste training sessions for the plant's operations personnel. A total of 35 workers attended the sessions which focused specifically on hazardous waste requirements as they relate to the individual's job. A copy of the attendee lists and the training session outline are attached. A training review (test) was completed by each attendee which demonstrated their comprehension of the necessary information. The individual training reviews will be retained as part of the training documentation.

Hazardous waste job descriptions for waste management tasks at the Oakland plant are attached along with the name of persons filling the hazardous waste management jobs. With the exception of "Handlers" Patti Nielsen and Kathy Allen who attend off-site refresher courses annually, all the listed individuals have received job related refresher training within the past month.

All areas related to training, identified in Arlene Kabei's letter of June 17, 1998, have been addressed and corrected. The plant will continue to comply with applicable hazardous waste regulations. If there are any questions related to this submittal, please give me a call at (510) 436-2058.

Sincerely,

Hank Wiegel
Plant Engineer

Attachments (3)

bcc: Dick Schieder Oakland
 Bob Stutz Oakland
 Patti Nielsen Oakland
 Steve Springer Oakland
 Walt Long 30 LDP
 Bob Neal Pleasanton

OWENS-BROCKWAY

GLASS CONTAINERS
a unit of Owens-Illinois



3600 Alameda Ave.
Oakland, CA. 94604

April 16, 1998

U.S. Environmental Protection Agency
Mr. Clinton Seiter
75 Hawthorne Street (WST-3-1)
San Francisco, CA. 94105-3901

Mr. Seiter

Enclosed is the information that you requested from you visit on April 9, 1998. If I can be of any further help, please give me a call at 510-436-2183.

Sincerely,

A handwritten signature in black ink that reads 'Steve Springer'. The signature is written in a cursive, flowing style with a prominent 'S' and a long, sweeping underline.

Steve Springer
General Foreman

CLASSIFICATION LEVELS
FOR
GLASS CONTAINER DIVISION
MAINTENANCE WORKERS

4/1/77

UTILITY WORKER

The duties of this classification involve manual and laboring work requiring only a limited degree of skill, training, or plant experience. The individual performs simple duties in plant maintenance, using such simple equipment as bend and hand tools, brooms, shovels, cleaning equipment, etc. The utility worker may perform laboring duties associated with moving and installing heavy machinery and equipment, upkeep, demolition, and construction. The individual normally is closely supervised by a foreman or crew leader. Performs other related duties as assigned.

HELPERS

Individuals in this classification normally work under the direction of tradesmen, and assist tradesmen in such ways as delivering tools and supplies, performing simple tasks incident to the work of tradesmen, cleaning up work areas, etc. May oil, grease, clean and inspect equipment, and may salvage and store parts. Uses simple hand tools. May move and handle heavy equipment and supplies, and may operate tractors, Hi-lifts, or trucks in connection with maintenance and repair, furnace rebuilds, plant cleanup, etc. Performs other related duties as assigned.

HANDY WORKER

Work in this classification requires approximately the same level of ability as that of the Helper, but involves, in addition to some Helper duties, specialized experience in one or more unskilled or semi-skilled areas. Examples include, but are not limited to, tool or cutter grinding, maintenance and storage of tools, oiling and upkeep of special equipment, operation of special equipment such as cranes or hoists, etc. Performs other related duties as assigned.

APPRENTICE CLASSIFICATIONS

Duties and responsibilities of apprentices are included in the apprentice agreements in effect at each plant. Performs other related duties as assigned.

REPAIRMAN

An individual in this classification performs semi-skilled or skilled work in trades which are not apprenticeable under the apprentice program, such as painting, carpentry, bricklaying, tinsmithing, etc., or individual may perform tradesman work requiring moderate skill, but individual has not been enrolled in the apprentice program. Performs other related duties as assigned.

MAINTENANCE JOURNEYMAN

All maintenance tradesmen who have completed the Maintenance Apprenticeship Program fall in this category. Performs other related duties as assigned.

MACHINE REPAIRMAN JOURNEYMAN

All repairmen of bottle machines and related equipment who have completed the Machine Repair Apprentice Program fall in this category. Performs other related duties as assigned.

J O B S P E C I F I C A T I O N

Job Title MAINTENANCE FOREMAN I			Job No. LNC03		
Division GCD	Plant Location Oakland, CA	Department Maintenance	Job Level		
General Function & Responsibility:			Points 113	Rate Group	Hourly Rate
<p>Supervises skilled hourly tradesmen engaged in one or more of the following: electrical maintenance, carpentry, pipe fitting, welding, bricklaying, auto mechanics, plant systems (air conditioning, air, oils, water, etc.), iron and steel work, instrumentation, sheet metal and mechanical repair, electronics, etc.</p>					
<p>Duties:</p> <ol style="list-style-type: none"> 1. Assists supervisor with assignment of personnel and equipment. Follows work schedule to insure work is completed on time. 2. Reviews operation and makes recommendations relative to changes in organization, personnel, equipment and procedures. 3. Assists with the following personnel functions: disciplining and training of employees, settling grievances, supervising safety and housekeeping programs, and administering personnel policies. 4. Conducts periodic inspections of plant systems, equipment, facilities, and grounds. 5. Has major responsibility for quality of work performed by maintenance employees. Assists with supervision of construction work performed by outside contractors. 6. Assists with inventory control program for department and designated plant parts, supplies, materials and equipment. Also supervises maintenance of storage areas. 7. Attends department meetings and conducts meetings as required. Meets with foremen from other departments to discuss mutual work problems. 8. Responsible for proper maintenance of production and time records. 9. Performs other duties as assigned. 					
<p>Qualifications:</p> <p>General <u>Management, communication, and engineering skills.</u></p> <p>Education or equivalent <u>High school graduate or equivalent training and experience.</u></p> <p>Experience/prerequisite training <u>Several years experience in Maint. skilled trades work or formal training equivalency.</u></p> <p>Special qualifications or skills _____</p>					
<p>Job Parameters:</p> <p>Reports to (job title): <u>Plant Engineer or Assistant Plant Engineer</u></p> <p>Personnel supervised or directed: _____ Salary <u>45-55</u> Hourly</p> <p>Job conditions: <input checked="" type="checkbox"/> Inside <input checked="" type="checkbox"/> Outside <input type="checkbox"/> Temperature extremes <input checked="" type="checkbox"/> Noisy <input checked="" type="checkbox"/> Dirty <input type="checkbox"/> Other _____</p> <p>Job effort: Physical strength - <input checked="" type="checkbox"/> Light <input type="checkbox"/> Medium <input type="checkbox"/> Heavy</p> <p>Job hours: <input checked="" type="checkbox"/> Days <input type="checkbox"/> Rotating shifts <input checked="" type="checkbox"/> Other <u>Assigned shifts.</u></p> <p>Equipment: <input type="checkbox"/> Office machines (typewriter, calculator, etc.) <input type="checkbox"/> Laboratory <input type="checkbox"/> Machine tools <input type="checkbox"/> Data processing <input checked="" type="checkbox"/> Other <u>Testing/control instruments; repair/maintenance tools and machinery.</u></p>					
Analyzed by HAC/WBH	Date 1/81	Checked by WRP	Date 1/81	W&S Approval DNL	Date MAR 17

J O B S P E C I F I C A T I O N

Job Title PLANT ENGINEER			Job No. LNC10		
Division GCD	Plant Location Oakland, CA	Department Maintenance	Job Level		
<u>General Function & Responsibility:</u>			Points 185	Rate Group	Hourly Rate
<p>Directs subordinate supervision and salary and hourly personnel engaged in all phases of plant engineering function, including installation, repair, and maintenance of all plant systems, equipment, grounds, and facilities, including pollution control systems. Responsible for all related design work.</p>					
<p><u>Duties:</u></p> <ol style="list-style-type: none"> 1. Plans department work schedules and directs assignment of personnel and equipment. Insures work is completed on time, and revises work schedules to reflect changed plant or department priorities. 2. Analyzes operations and makes recommendations to supervisor relative to changes in organization, personnel, equipment, department policies and procedures. Prepares department short and long range plans. Reviews and recommends appropriate action on maintenance requests, materials requisitions, forms 901, etc. 3. Hires and disciplines employees; supervises training and development of personnel; participates in settling of grievances; directs safety and housekeeping programs; insures personnel policies are properly applied. 4. Conducts periodic inspections of all plant systems, equipment, facilities and grounds, and takes corrective action. Directs plant preventive maintenance programs; has a major responsibility for furnace rebuilds. 5. Responsible for quality of all work performed by maintenance employees. Also coordinates and supervises all construction work performed by outside contractors. 6. Responsible for all department and designated plant parts, supplies, materials and equipment. Submits requisitions to Purchasing, and meets with vendor representatives to discuss technical requirements. 7. Conducts regular department meetings. Meets with supervisor and other supervisors and managers to discuss common problems and projects. Has working relationship with Toledo Engineering and outside contractors. 8. Develops and administers department budget. Responsible for accurate preparation and maintenance of all department records and reports. 9. Performs other duties as assigned. 					
<p><u>Qualifications:</u></p> <p>General <u>Management, communication and diversified engineering.</u></p> <p>Education or equivalent <u>BS degree in Mechanical or Electrical Engineering.</u></p> <p>Experience/prerequisite training <u>Experience as Maint. foreman and/or in plant engineering services.</u></p> <p>Special qualifications or skills <u></u></p>					
<p><u>Job Parameters:</u></p> <p>Reports to (job title): <u>Plant Manager</u></p> <p>Personnel supervised or directed: <u>3-5</u> Salary <u>77</u> Hourly</p> <p>Job conditions: <input checked="" type="checkbox"/> Inside <input checked="" type="checkbox"/> Outside <input type="checkbox"/> Temperature extremes <input checked="" type="checkbox"/> Noisy <input checked="" type="checkbox"/> Dirty <input type="checkbox"/> Other <u></u></p> <p>Job effort: Physical strength - <input checked="" type="checkbox"/> Light <input type="checkbox"/> Medium <input type="checkbox"/> Heavy</p> <p>Job hours: <input checked="" type="checkbox"/> Days <input type="checkbox"/> Rotating shifts <input type="checkbox"/> Other <u></u></p> <p>Equipment: <input type="checkbox"/> Office machines (typewriter, calculator, etc.) <input type="checkbox"/> Laboratory <input type="checkbox"/> Machine tools <input type="checkbox"/> Data processing <input checked="" type="checkbox"/> Other <u>Repair & maintenance tools and machines; testing & control instruments.</u></p>					
Analyzed by HAC/WBH	Date 1/81	Checked by WRP	Date 1/81	W&S Approval DNL	Date FEB 22 1982

ATTENDEE LIST

SPILL RESPONSE TRAINING (First Responder - Awareness Level)

DATE: 9/9/97 PLANT: Oakland INSTRUCTOR: B. Neal
(2 pm. session)

SUBJECTS COVERED: Haz. Substances, 1st. Responder Actions, Video
Emergency vs. Incidental Spills, Reporting, Spill Plan
See Attached Agenda and Copy of Slides

<u>NAME (print)</u>	<u>SIGNATURE</u>	<u>JOB TITLE</u>
1. Bob Neal	Robert C. Neal	Environmental Administrator
2. Steve Springer	Steve Springer	General Foreman
3. ANTONIO LANDAUETO	Antonio Landaueto	Selecting Maintenance
4. FRANK GOOCH	Frank Gooch	SELECTING MAINT.
5. Don Clark	Don Clark	Selecting Maint.
6. Kirk Winsty	Kirk Winsty	sel maint.
7. FORREST MAXO	Forrest Maxo	MAINT.
8. Tom MAHONEY	Tom Mahoney	Gen Maint.
9. RON SAKMER	Ron Sakmer	Gen Maint
10. RICHARD TORRES	Richard Torres	GEN. MAINT.
11. LARRY BERTRAND	Larry Bertrand	MAINT
12. DAVID BURNIGHT	David Burnight	MAINT.
13. MIKE NIETO GOMEZ	Michael Nieto Gomez	Maint
14. Jesus IVARELA	Jesus Ivarola	maint
15. Jerry S Martinez		
16.		
17.		

ATTENDEE LIST

SPILL RESPONSE TRAINING

(First Responder - Awareness Level)

DATE: 9/9/97 PLANT: Oakland INSTRUCTOR: B. Neal

(3 pm. session)
SUBJECTS COVERED: Haz. Substances, 1st Responder Actions, Video
Emergency vs. Incidental Spills, Reporting, Spill Plan
See Attached Agenda and Copy of Slides

<u>NAME (print)</u>	<u>SIGNATURE</u>	<u>JOB TITLE</u>
1. Bob Neal	Robert C. Neal	Environmental Administrator
2. Neil Seratini	Neil Seratini	MAINT.
3. RAYMOND TORRES	Raymond Torres	SEL. MAINT.
4. JAVIER MORALES	Juan N. Morales	MAINT MECH. APP.
5. Charles Pugh Jr.	Charles S. Pugh Jr.	MAINT ELECT.
6. ED CANDAL	Ed Candal	ELECTRICIAN
7. JIM CACHERO	Jim Cacherio	ELECTRICIAN
8. WES EIDE	Wesley Eide	PROCESS CONTROL
9. JOSE T MORALES	Jose T Morales	SELECT MAINT.
10. NERY D. ALDANA	Nery Aldana	Selecting Maint.
11. CALVIN YADEN	Calvin C. Yaden	MECHANIC, SELECT
12.		
13.		
14.		
15.		
16.		
17.		

ATTENDEE LIST

SPILL RESPONSE TRAINING

(First Responder - Awareness Level)

DATE: 9/10/97 PLANT: Oakland INSTRUCTOR: B. Neal

(6:00 a.m. session)

SUBJECTS COVERED: Haz. Substances, 1st. Responder Actions, Video "Prepare to Respond"
Emergency vs. Incidental Spills, Reporting Rpt'd, Spill Plan
See Attached Agenda and Handout

<u>NAME (print)</u>	<u>SIGNATURE</u>	<u>JOB TITLE</u>
1. Bob Neal	Robert C. Neal	Environmental Administrator
2. DAVID Strayer	David Strayer	Select maint
3. MICHEL LHEUREUX	Michel Lheureux	" "
4. HENRY CHEW	Henry Chew	sel. maint.
5. GREG BROWN	Greg Brown	" "
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ATTENDEE LIST

SPILL RESPONSE TRAINING (First Responder - Awareness Level)

DATE: 9/10/97 PLANT: Oakland INSTRUCTOR: Bob Neal
(Noon Session)

SUBJECTS COVERED: Haz. Substances, 1st. Responder Actions, Video "Prepare to Respond"
Emergency vs. Incidental Spills, Reporting Rpt., Spill Plan
See Attached Agenda and Handout

NAME (print)	SIGNATURE	JOB TITLE
1. Bob Neal	Robert C. Neal	Environmental Administrator
2. E. ZAMORA	Elctrozamor	M. Mechanic
3. ERNEST WAIGHT	Ernest Waight	M. MECHANIC
4. PEDRO RAMIREZ	Pedro Ramirez	JANITOR Not En d.
5. RICHARD W. GRAY	Richard W. Gray	C. E Foreman
6. JUANITO P. AGCANG	AGCANG	
7. Delong, William	William Delong	MONIT.
8. Roland Fong	Roland Fong	Sel. Maint
9. Enrique	Enrique	Sel Maint
10. Edgardo Valentin	E. Valentin	Sel. Maint
11. ROMEO M. BINONGCAL		SEL. MAINT.
12. HENRY V. RULL		SEL. MAINT.
13. Philip Cobb		
14. MIKE BATTU	Mike Battu	SEL MAINT.
15. EMIL BERNARDO	E. Bernardo	SEL. MAINT
16. J. Moruno	J. Moruno	Batch & Furnace Supervisor
17. J. HOLT	J. Holt	BATCH MAINT C.H.
H WOLF	H Wolf	CIA CREW LEADER
H WOLF		
J. LAMER	J. Lamer	M. MECH.

P. Hord

Philip Hord
Ray D. Williams
Vic Carlson

Richard D. H.

DAVE ALLAMONG

9/10/97

Noon Session
Continued

How Killer

ATTENDEE LIST

SPILL RESPONSE TRAINING

(First Responder - Awareness Level)

DATE: 9/10/97 PLANT: Oakland INSTRUCTOR: Bob Neal
(3 p.m. session)

SUBJECTS COVERED: Haz. Substances, 1st Responder Actions, Video "Prepare to Respond"
Emergency vs. Incidental Spills, Reporting Regs., Spill Plan
See Attached Agenda and Handout

<u>NAME (print)</u>	<u>SIGNATURE</u>	<u>JOB TITLE</u>
1. Bob Neal	Robert C. Neal	Environmental Administrator
2. Virgil HENLEY	Virgil Henley	C & Maint. Supervisor
3. ALEX GUTIERREZ	Alex Gutierrez	Master Mechanic
4. INN C LEE	Immanuel Lee	mechanic
5. JESUS G. DONES	Jesus G. Dones	LEAD MECHANIC
6. Bill Horn	Bill Horn Bill Horn	mechanic
7. Noel Lansangan	Noel Lansangan	Maintenance Tech
8. Hank Wiegand	Hank Wiegand	Plt Eng.
9.		
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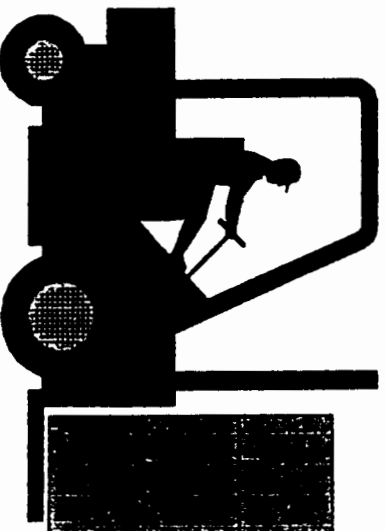
SPILL RESPONSE TRAINING AGENDA

(First Responder - Awareness Level)

- First Responder - Awareness Level Defined
- General Principles of Hazardous Substances
- Hazardous Substances in a Glass Plant
- Spill Response Classifications
- "Prepare to Respond" (18 min. video)
- First Response - Awareness Level Actions
- Plant Spill Contingency Plan
- Miscellaneous Information
- Review

SPILL RESPONSE TRAINING

(FIRST RESPONDER - AWARENESS LEVEL)



SPILL RESPONSE TRAINING AGENDA

(First Responder - Awareness Level)

- First Responder - Awareness Level Defined
- General Principles of Hazardous Substances
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■ FIRST RESPONDER - AWARENESS LEVEL

- First responders at the awareness level are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency* response sequence by notifying the authorities of the release. First responders at the awareness level shall have sufficient training or have had sufficient experience to objectively demonstrate competency in the following areas:
 - understand what hazardous substances are and the risk associated with them in an incident
 - understand the potential outcomes associated with an emergency when hazardous materials are present

■ FIRST RESPONDER - AWARENESS LEVEL

(Continued)

- the ability to recognize the presence of hazardous substances in an emergency
- the ability to identify the hazardous substance(s), if possible
- understanding of the role of the first responder awareness level individual in the employer's emergency response plan
- the ability to realize the need for additional resources, and to make appropriate notification

GENERAL PRINCIPLES OF HAZARDOUS SUBSTANCES

– Classes of Hazards

- **Physical** - Includes fires, explosions or other effects by mechanical means. Physical hazards may result from hazardous substances such as gasoline, compressed gases, cryogenic liquids, oxidizers and corrosive (acid or caustic) mixtures .
- **Health** - Contact your body directly and can cause biological reactions, destroy tissue or make you sick. These hazards may be immediate or delayed (**Acute** or **Chronic**). Health hazards may result from hazardous substances such as toxics (poisons, irritants, carcinogens, mutagens) or corrosives (acids and caustics).

HAZARDOUS SUBSTANCES

- Hazardous substances are materials to which exposure results in or may result in adverse affects on health, safety or the environment.
- Typical Hazardous Substances
 - Flammables (gasoline, propane, MEK)
 - Combustibles (diesel, oils, paints, solvents)
 - Corrosives (acids, caustics, salts)
 - Toxics (ammonia, chlorine, pesticides)
 - Reactives (explosives, oxidizers, a/b mixtures)
 - Hazardous Wastes (all RCRA wastes)
 - Compressed Gas (acetylene, propane, chlorine)
 - Physical Hazards (cryogenic liquids, molten s)

HAZARDOUS SUBSTANCES

COMMON IN A GLASS PLANT

HAZARDOUS SUBSTANCE	NAERG #
Safety Kleen Parts Washer Solvents	128
Methyl Ethyl Ketone (MEK)	127
Ammonia	125
Tin Tetrachloride	137
Sulfuric Acid	137
Muriatic Acid	157
Oakite (Caustic Cleaner) / Caustic Soda	154
Lube Oils / Diesel / Used Oil / Gasoline	128
Propane	115
Water Treatment Chemicals	154
Chlorine	124
SFL (contains xylene)	130
Checker Dust	171
Tin Reclaimable Material	154

SPILL RESPONSE CLASSIFICATIONS

- An **Emergency Response** is defined as a response effort **by persons from outside the immediate release area** or by other designated responders (i.e. fire department) **to an** occurrence which results or is likely to result, in an **uncontrolled release of a hazardous substance**.
- Responses to **incidental releases** of hazardous substances **where the substance can be absorbed, neutralized, or otherwise controlled** at the time of release **by employees in the immediate area**, or by maintenance personnel **are not considered to be emergency responses**. Responses to release of hazardous substances where there is no potential safety or health hazard (i.e. fire, explosion or chemical exposure) **are not emergency responses**.

EMERGENCY RESPONSE VS INCIDENTAL SPILL

Any of the following would be considered an "emergency".

- The release / spill is forcing workers out of the area!
The immediate area needs to be evacuated.
- The required level of personal protective equipment exceeds the level provided the employee for handling.
- There is a potential risk to health, safety, or environment.

If one or more of the above conditions is present - an emergency response situation exists.

Assessment of hazardous conditions and substances is a case-by-case issue when determining incidental vs emergency situations.

"Prepare To Respond"

- Video on First Responder - Awareness Level

FIRST RESPONSE

AWARENESS LEVEL ACTIONS

- **Fundamentals of a First Response**
 - **Approach cautiously** from upwind. Do not rush in; others cannot be helped until the situation has been fully assessed.
 - **Secure the scene.** Without entering the immediate area, isolate the area and assure the safety of people and the environment, keep people away from the spill area.
 - **Identify the hazard.** Placards, container labels, shipping documents, or knowledgeable persons on the scene are valuable sources of information.

– Fundamentals of a First Response (Cont'd)

- **Assess the situation.** Does the amount of the spill / release constitute a "hazard"? What about the location of the spilled substance?
- **Obtain Help!** Obtain internal help and if needed advise management to notify responsible agencies and call for assistance from qualified personnel.
- **Decide on site entry.** Any efforts to rescue persons, protect property or the environment must be weighed against the possibility that **you could become part of the problem.** Enter the spill area **only** if you are wearing appropriate protective gear and you have the appropriate level of training.

- Fundamentals of a First Response (Cont'd)
- **RESPOND ONLY WITH QUALIFIED, TRAINED AND PROPERLY EQUIPPED PERSONNEL.** Respond in an appropriate manner. Establish a command post. Rescue any casualties only where possible without personal risk. Evacuate if necessary. Maintain control of the area. Continually assess the situation and modify the response accordingly. **The first duty is to consider the safety of people.**

– Fundamentals of a First Response (Cont'd)

- **General Rules of Thumb**

Do not walk into or handle spilled material.

Avoid inhalation of fumes, smoke, and vapors, even if no haz. material is known to be involved.

Do not assume that gasses or vapors are harmless due to a lack of odor. They could be harmful!

REPORTING REQUIREMENTS

- Reporting Requirements. EPCRA, CERCLA, RCRA and CWA. Any of the following fall under the reporting requirements.
 - The released material exceeds the Reportable Quantity (RQ) in any 24-hour period.
 - A release, fire, explosion that could threaten human health or the environment outside the facility.
 - An oil spill into the "navigable waterways" of the US or onto land from which it might flow or drain into said waters.
- Such spills must be immediately reported to the National Response Center, local authorities and State authorities. **Not all spills require notification.**

REPORTABLE QUANTITIES

FOR COMMON GLASS PLANT SUBSTANCES

HAZARDOUS SUBSTANCE	REPORTABLE QUANTITY
Ammonia	100 lbs
Checker Dust	100 lbs
Sulfuric Acid	1,000 lbs
Potassium Hydroxide	2,000 lbs
Methyl Ethyl Ketone (MEK)	5,000 lbs
Hydrochloric Acid	5,000 lbs
Tin Tetrachloride	8,910 lbs
Tin Reclaimable Material	15,150 lbs
Oil on Navigable Waters	Quantity that produces sheen

REVIEW

SPILL RESPONSE

(First Responder - Awareness Level)

- First Responder - Awareness Level Defined
- General Principles of Hazardous Substances
- Hazardous Substances in a Glass Plant
- Spill Response Classifications
--(Incidental vs Emergency)--
- "Prepare to Respond" (video)
- First Response - Awareness Level Actions
- Plant Spill Contingency Plan
- Miscellaneous Information

Job Description and Classification

Plant Job Title STORES RECEIVER & DISPENSER - 1st CLASS Plant Job Code 0-90
Plant 20, 21, 23, 22 Standard Title _____
Department Purchasing & Stores Std. Job Code _____
Operation GC - West Effective Date 6-22-73

PRIMARY FUNCTION:

To perform general plant storekeeping duties involving receiving, storing and issuing storeroom materials and supplies.

TOOLS AND EQUIPMENT:

Hammer, nail puller, pliers, power hacksaw, hi-lift, calculator, etc.

MATERIALS AND PRODUCTS:

Storeroom materials and supplies, refractories, stationery, etc.

SUPERVISED BY:

Storeroom Supervisor or Storekeeper-Buyer

DIRECTION EXERCISED:

May relay instruction to the Stores Receiver & Dispenser-2nd Class.

TYPICAL DUTIES:

1. Receives, counts, inspects and verifies incoming materials and supplies and stores systematically on shelves or bins. May use hi-lift to unload or move heavy material. Performs some unloading manually.
2. Packs materials or supplies not meeting specifications for return to suppliers, and prepares materials or supplies for shipment to other plants. Weighs material to be sent out such as molds or machine parts and will move boxes or crates to proper pickup point.
3. Processes necessary paper work to reflect such transfers.
4. Dispenses storeroom materials and supplies to plant personnel against approved requisitions. Refers certain requisitions to salvage center when substitute material possible.
5. Receives, checks, stores and dispenses stationery stores and supplies to Pacific Region Plants, Sales Branches and General Offices. (Oakland)
6. Inventories a portion of stock daily, checks against stock cards and requests replacement of "non-value" items to maintain normal inventory. Participates in regular physical inventoring.
7. Places orders with vendors to replenish stock when we have a blanket order with the vendor. Otherwise will pull and process a Traveling Requisition when the re-order point is reached on an item.
8. Posts activity to stock record cards.
9. Keeps work area neat and orderly.
10. Is responsible for notifying the department involved whenever an item comes in for which they are waiting.
11. Measures gas and oil in storage tanks, counts frit inventory and some batch colorant material.

Company Owens-Illinois, Inc. Plant 20, 21, 23, 22Plant Job Title Stores Receiver & Dispenser-1st Class Std. Job Title _____Plant Job Code 0-90 Std. Job Code _____

	Factor	Degree	Points	Reason for Classification
Skills	1 Knowledge	B	.5	Requires some specialized knowledge involving accepted storekeeping and dispensing procedures.
	2 Experience	C	1.0	Requires up to 12 months of continuous experience to become familiar with a wide variety of materials handled and storeroom procedures.
	3 Judgment	C	1.0	Uses judgment to perform semi-routine storeroom duties and handle responsibilities where actions to be taken and decisions to be made are somewhat limited.
	4 Manual Skill	B	.4	Operates a hi-lift from time to time in unloading or moving materials, supplies or refractories.
Responsibility	5 Materials and Products	Cb	1.7	Duties are standardized subject to clearly defined practices and procedures and general supervision. Errors made in receiving or dispensing material or supplies would not normally exceed \$1000.
	6 Tools and Equipment	Ca	.5	Required to use care when operating hi-lift to prevent damage. Probability of damage is low.
Effort	7 Mental	B	.5	Light mental and visual application required in receiving incoming materials and supplies, in dispensing items, and in maintaining storeroom.
	8 Physical	Ca	.6	Moderate physical exertion required. Materials vary from light to heavy with handling of medium to heavy weight items intermittently.
Conditions	9 Surroundings	B	.5	Is exposed to inside and outside conditions due to location of storeroom, however, not required to remain out in extreme conditions.
	10 Hazards	B	.5	Accident hazards moderate with some exposure to cuts, bruises or crushed fingers when handling medium to heavy weight items.

Total Points	7.2	Described By <u>DNL</u>	Date <u>6-22-73</u>	Supercedes: Same Plant Job Title Same Plant Job Code
Job Group	7	Classified By <u>DNL</u>	Date <u>6-22-73</u>	
		Approved By <u>RLS</u>	Date _____	

COMPANY OWENS-ILLINOIS, INC.

Job Description and Classification

G0304

Plant Job Title UTILITY WORKER Plant Job Code G-31
Plant #20, #21, #23 Standard Title _____
Department SELECTING Std. Job Code _____
Operation GC - West Effective Date 9-1-69

PRIMARY FUNCTION:

To perform general cleanup and utility work in the Resort area.

TOOLS and EQUIPMENT:

Broom, shovel, dust pan, trash cans, hand truck, etc.

MATERIALS and PRODUCTS:

Cullet, cartons, pallets, etc.

SUPERVISED BY:

Shift Foreman

DIRECTION EXERCISED:

None

TYPICAL DUTIES:

1. Sweeps, cleans up and disposes of broken glass, damaged cartons and other debris in the Resort area.
2. Dumps ware resulting from cullet authorization.
3. Salvages corrugated cases.
4. Transfers cases of ware from pallets to resort tables.
5. Moves empty pallets by hydraulic hand truck to pickup area.
6. Moves or assists in moving resort equipment such as tables, conveyors, etc.

Company OWENS-ILLINOIS, INC.Plant #20, #21, #23Plant Job Title UTILITY WORKER

Std. Job Title _____

Plant Job Code G-31

Std. Job Code _____

	Factor	Degree	Points	Reason for Classification
Skills	1 Knowledge	A	Base	Performs work of a semi-repetitive nature to carry out simple verbal or written instructions handling routine manual tasks.
	2 Experience	A	Base	Requires 2 to 4 weeks of continuous progress to gain sufficient experience to perform duties proficiently.
	3 Judgment	A	Base	Performs simple, repetitive, routine and closely directed tasks.
	4 Manual Skill	A	Base	Handles ordinary material manually where manual dexterity and accuracy are not of particular importance.
Responsibility	5 Materials and Products	A	Base	Performs manual cleanup and routine material handling duties where damage or loss to materials is unlikely.
	6 Tools and Equipment	Ba	.2	Required to prevent damage in using a hand lift truck, but probability of damage is low.
Effort	7 Mental	A	Base	Minimum mental or visual application required for performing routine, simple cleanup and material handling duties.
	8 Physical	Da	1.4	Handles medium to heavy weight materials when transferring ware or assisting in the moving of equipment, but extent of such work is less than 50% of working time.
Conditions	9 Surroundings	A	Base	Works inside average factory type building with some exposure to dirt, noise and not necessarily uniformly heated.
	10 Hazards	B	.5	Hazards exists with some exposure to cuts, bruises or crushed fingers when handling medium to heavy weight products.

Total Points

2.1

Described By

ACM

Date

Supercedes:

Job Group

2

Classified By

ACM

Date

Same

Approved By

RLS

Date

Plant Job Title

Plant Job Code

JOB DESCRIPTION & CLASSIFICATION

OWENS-ILLINOIS

B1100

Plant Job Title Furnace Tender Plant Job Code B-110
Plant #20, 21 Standard Title _____
Department Batch & Furnace Std. Job Code _____
Operation GC - West Effective Date 9/1/69

PRIMARY FUNCTION:

To charge and operate furnaces and to observe and adjust controls in the production of molten glass.

TOOLS AND EQUIPMENT:

Gas, oil or electric furnaces and related feeding, recording and controlling equipment, hand tools, etc.

MATERIALS AND PRODUCTS:

Batch material, fuel, air, molten glass, etc.

SUPERVISED BY:

Combustion Engineer

DIRECTION EXERCISED:

None

TYPICAL DUTIES:

1. Charges furnaces with batch material at required rate.
2. Observes various indicating and recording instruments to ensure specified material and fuel temperatures, levels, pressures, etc., as applicable and makes necessary adjustments or changes to maintain prescribed procedures.
3. Operates small frit furnace as necessary.
4. Periodically examines furnaces and related feeding and control equipment, notifying Foreman of malfunctions.
5. Maintains record of furnace operation, material use, output, fuel consumption, etc., as required.

Plant #20, 21Plant Job Title Furnace Tender Std. Job Title _____Plant Job Code B-110 Std. Job Code _____

	Factor	Degree	Points	Reason for Classification
Skills	1 Knowledge	B	.5	Requires knowledge of furnace operation to make necessary decisions and adjustments.
	2 Experience	D	2.0	Requires more than 12 months but less than 24 months to become proficient.
	3 Judgment	C	1.0	Uses judgment where actions to be taken and decisions made to operate furnace are limited.
	4 Manual Skill	A	Base	Operates simple controls. Dexterity and pace are not of particular importance.
Responsibility	5 Materials and Products	Cc	2.5	Follows standardized procedures in operation of furnace. Has some latitude in operation of furnace which can result in material or product losses exceeding \$1,000.
	6 Tools and Equipment	Da	1.0	Intermittent care and attention required to prevent damage in operation of glass furnace. Large measure of control placed on automatic devices.
Effort	7 Mental	C	1.0	Moderate mental or visual application required to detect and adjust for variance from proper furnace operation.
	8 Physical	Ba	.2	Low physical exertion required. Considerable walking and climbing involved, and some clean up and handling of light tools, but for less than 50% of the work period.
Conditions	9 Surroundings	C	1.0	Considerable heat when in proximity of furnace but not for extended periods.
	10 Hazards	C	1.0	Exposure to burns and falls such as may occur when working on and around furnaces.

Total Points 10.2Job Group 10Described By JHF Date 4/22/77Classified By JHF Date 4/22/77Approved By HMW Date _____

Supercedes:

SAME

Plant Job Title

SAME

Plant Job Code

BOB BARBER → CONTACT NAME

Facsimile Transmission Face Sheet



City of Oakland
FIRE DEPARTMENT
OFFICE OF EMERGENCY SERVICES

TO: Clint Sieton FAX: 415-744-1044FROM: Lenoy Griffin PHONE: 510-238-3938NOTES: pages 1-3 inspection reports Hazardous Wastepage 4-10 " HMBPNO. PAGES INCLUDING THIS: 11 DATE: 4/3/98 TIME: 2:10 PM

CITY OF OAKLAND
FIRE DEPARTMENT
OFFICE OF EMERGENCY SERVICES DIVISION
505 14th Street, 7th Floor
Oakland, CA 94612

PHONE (510) 238-3938
FAX (510) 238-7761

HAZARDOUS WASTE GENERATOR INSPECTION REPORT

FACILITY NAME:

Owens Brothers

EPA I.D.#:

CAT 000618918

ADDRESS:

3600 Alameda Ave.

DATE:

11-4-97

	CODE SECTION	COMPLIANCE				CODE SECTION	COMPLIANCE		
		YES	NO	N/A			YES	NO	N/A
1. IDENTIFICATION NUMBER					6. CONTINGENCY/BUSINESS PLAN				
(a) Obtained EPA I.D. Number	66262.12(a)	X			(a) Contingency Plan Complete	66265.52(a-f)	X		
(b) Transporter and TSDF Have EPA I.D.#	66265.12(c)	X			(b) Copy of Plan on Site	66265.53			
2. PRE-TRANSPORT REQUIREMENTS					(c) Contingency/Business Plan Submitted				
(a) HW Containers Labeled	66262.31		X		(d) Plan Amended as Necessary	66265.54			
(b) HW Label Properly Filled Out	66262.32(14)				(e) ER Coordinator Familiar w/Plan	66265.55			
(c) HW Accumulation of Time Not Exceeded	66262.34 (c)				7. PREPAREDNESS AND PREVENTION				
(d) Accumulation Date Indicated	66262.34(f)				(a) Internal Commun./Alarm Provided	66265.32(a)			
(e) Description of HW Contents	66262.34(f)				(b) A Device to Call Outside Provided	66265.32(b)			
(f) HW Containers in Good Condition	66265.171				(c) Spill Control Systems Available	66265.32(c)			
(g) HW Compatible with Containers	66265.172				(d) Maintain ER Equipment	66265.33			
(h) HW Containers Closed/Sealed	66265.173				(e) Security Measure	66265.14			
(i) HW Storage Area Inspected Weekly	66265.174				(f) Maintain Adequate Aisle Space	66265.35			
(j) Tank & Tank Equip. Inspected Daily	66265.195				(g) Arrangements w/Local Agencies	66235.37			
(k) Incompatible HW in Separate Containers	66265.199				8. EMERGENCY PROCEDURES				
(l) Proper Management of Used Oil Filters	66266.130			X	(a) Character/Source/Extent of ER Determined	66265.56			X
3. RECORDKEEPING AND REPORTING					(b) Proper Agencies Notified of Health Hazard	66265.56			X
(a) HW Analysis Kept 5 Yrs./Land Disposal	66262.11			X	(c) ER Data Submitted to DTSC & LIA	66265.56			X
(b) Biennial Report Submitted to State	66262.41			X	(d) Uncontrol. Release HW Property Handled	66235.56			X
4. MANIFEST/RECEIPTS					9. WASTE STREAMS				
(a) HW Shipped with Proper Manifest	66262.20		X		(a) Waste Oil		X		
(b) Manifests Kept for Last 3 Years	66262.40(a)		X		(b) Non-Halogenated Solvents/Parts Cleaner		X		
(c) HW Analysis Kept for 3 Years	66262.40(c)			X	(c) Ethylene Glycol/Antifreeze				
(d) Manifests Received from TSDF	66262.42	X			(d) Oily Sludges				
5. TRAINING					(e) Other:				
(a) Training Program Provided	66265.16		X		(f) Other:				
(b) Personnel Trained & Supervised	66265.16(b)		X		(g) Other:				
(c) HW Personnel Trained within 6 Months	66265.16(b)		X		(h) Other:				
(d) Training Records Kept on Site	66265.16(d)		X						
(e) Training Records Maintained for 3 Years	66265.16(e)		X						
(f) Training Records Complete	66265.16(1.2)		X		All above code sections refer to the California Code of Reg. Title 22				
Source Reduction Plan Completed	25244.19			X	Pollution Prevention	Health & Safety Code			

REMARKS:

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Inspection Form

II, III

II.A BUSINESS PLANS (Title 19)

- | | |
|--------------------------|----------|
| 1. Immediate Reporting | 2703 |
| 2. Bus. Plan Stds. | 25503(b) |
| 3. R/C Can > 30 days | 25503.7 |
| 4. Inventory Information | 25504(a) |
| 5. Inventory Complete | 2730 |
| 6. Emergency Response | 25504(b) |
| 7. Training | 25504(c) |
| 8. Deficiency | 25505(a) |
| 9. Modification | 25505(b) |

II.B ACUTELY HAZ. MATLS

- | | |
|---------------------------------|----------|
| 10. Registration Form Filed | 25533(a) |
| 11. Form Complete | 25533(b) |
| 12. RMPP Contents | 25534(c) |
| 13. Implement Sch. Req'd? (Y/N) | |
| 14. OnSite Corresp. Assess. | 25524(c) |
| 15. Probable Risk Assessment | 25534(d) |
| 16. Persons Responsible | 25534(g) |
| 17. Certification | 25534(f) |
| 18. Exemption Request? (Y/N) | 25536(b) |
| 19. Trade Secret Requested? | 25538 |

III. UNDERGROUND TANKS (Title 23)

- | | | |
|-------------------------------|----------------------------|-------------|
| General | 1. Permit Application | 25284 (H&S) |
| | 2. Pipeline Leak Detection | 25292 (H&S) |
| | 3. Records Maintenance | 2712 |
| | 4. Release Report | 2651 |
| | 5. Closure Plans | 2670 |
| Monitoring for Existing Tanks | 6. Method | |
| | 1) Monthly Test | |
| | 2) Daily Vadose | |
| | Semi-annual groundwater | |
| | One time test | |
| | 3) Daily Vadose | |
| | One time test | |
| | Annual tank test | |
| | 4) Monthly Groundwater | |
| | One time test | |
| 5) Daily Inventory | | |
| Annual tank testing | | |
| Cont pipe leak det | | |
| Vadose/groundwater mon. | | |
| 6) Daily Inventory | | |
| Annual tank testing | | |
| Cont pipe leak det | | |
| 7) Weekly Tank Gauge | | |
| Annual tank test | | |
| 8) Annual Tank Testing | | |
| Daily inventory | | |
| 9) Other | | |
| New Tanks | 7. Pre-Test Tank Test | 2643 |
| | Date: | |
| | 8. Inventory Rec. | 2644 |
| | 9. Soil Testing | 2646 |
| | 10. Ground Water | 2647 |
| | 11. Monitor Plan | 2632 |
| | 12. Access, Secure | 2634 |
| | 13. Plans Submit | 2711 |
| | Date: | |
| | 14. As Built | 2635 |
| | Date: | |

Site ID # 8606 Site Name OWENS BRICK WAY Today's Date 4/11/97

Site Address 3606 ALAMEDA

City OKLA Zip 94601 Phone 438-2058

MAX AMT stored > 500 lbs. 55 gal.. 200 cft.?

Inspection Categories:

- ☒ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
☒ II. Business Plans, Acute Hazardous Materials
☒ III. Underground Tanks

Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

— provide proper monitoring R.O. for
THE U.S.T. AS DISCUSSED
— COMPLETE AND SEND IN PART II
HMBP AS DISCUSSED
— LABEL 3 GALLON LABEL HAZ. WASTE
CONTAINERS
— SEND IN AIR, C, F, A, M, B, A, J, S, T.
— Comply within 30 DAYS!

Contact: _____

Title: _____

Signature: Bob Barker

Inspector: _____

Signature: [Signature]

II, III

white - env. health
yellow - facility
pink - files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

AMIR K. GHOLAMI
80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

(510)

II, III

Site ID # 864 Site Name OWENS-BROWN WAY Today's Date 10/4/93

II.A BUSINESS PLANS (Title 19)

- | | |
|--------------------------|----------|
| 1. Immediate Reporting | 2703 |
| 2. Bus. Plan Sids. | 25503(b) |
| 3. RR Cars > 30 days | 25503.7 |
| 4. Inventory Information | 25504(a) |
| 5. Inventory Complete | 2730 |
| 6. Emergency Response | 25504(b) |
| 7. Training | 25504(c) |
| 8. Deficiency | 25505(a) |
| 9. Modification | 25505(b) |

II.B ACUTELY HAZ. MATS

- | | |
|---------------------------------|----------|
| 10. Registration Form Filed | 25533(a) |
| 11. Form Complete | 25533(b) |
| 12. RMPP Contents | 25534(c) |
| 13. Implement Sch. Req'd? (Y/N) | |
| 14. Offsite Conseq. Assess. | 25524(c) |
| 15. Probable Risk Assessment | 25534(d) |
| 16. Persons Responsible | 25534(g) |
| 17. Certification | 25534(h) |
| 18. Exemption Request? (Y/N) | 25534(b) |
| 19. Trade Secret Requested? | 25538 |

III. UNDERGROUND TANKS (Title 23)

- | | | |
|---------|----------------------------|-------------|
| General | 1. Permit Application | 25284 (H&S) |
| | 2. Pipeline Leak Detection | 25292 (H&S) |
| | 3. Records Maintenance | 2712 |
| | 4. Release Report | 2651 |
| | 5. Closure Plans | 2670 |

- | | | |
|-------------------------------|-------------------------|--|
| Monitoring for Existing Tanks | 6. Method | |
| | 1) Monthly Test | |
| | 2) Daily Vadose | |
| | Semi-annual groundwater | |
| | One time soils | |
| | 3) Daily Vadose | |
| | One time soils | |
| | Annual tank test | |
| | 4) Monthly Groundwater | |
| | One time soils | |
| Monitoring for Existing Tanks | 5) Daily Inventory | |
| | Annual tank testing | |
| | Cont pipe leak det | |
| | Vadose/groundwater mon. | |
| | 6) Daily Inventory | |
| | Annual tank testing | |
| | Cont pipe leak det | |
| | 7) Weekly Tank Gauge | |
| | Annual tank testing | |
| | 8) Annual Tank Testing | |
| Daily Inventory | | |
| 9) Other | | |

- | | | |
|--|-----------------------|------|
| | 7. Periodic Tank Test | 2643 |
| | Date: | |
| | 8. Inventory Rec. | 2644 |
| | 9. Soil Testing | 2646 |
| | 10. Ground Water | 2647 |

- | | | |
|-----------|--------------------|------|
| New Tanks | 11. Monitor Plan | 2632 |
| | 12. Access, Secure | 2634 |
| | 13. Plans Submit | 2711 |
| | Date: | |
| | 14. As Built | 2635 |
| | Date: | |

Rev 8/88

Inspection Categories:

- ☒ Haz. Mat/Waste GENERATOR/TRANSPORTER
☒ II. Business Plans, Acute Hazardous Materials
☒ III. Underground Tanks

Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

5 vst removed 1986
- THIS FACILITY HAS ONLY 2 vst on site
1 DIESEL, 1 UNLEADED -
BOTH ARE DOUBLE WALLED FIBERGLASS WITH
MONITORING PROBES.
- TYPICAL WASTE (HAZ. WASTE) GENERATED
ARE:
- LUBRICATING OIL WASTE
- 1,1,1, TRICHLOROETHANE (PNE) WASTE
- BOTTLE WASTE -
2 x 5 gal. itaz HAZ. WASTE BOTTLES TO KALAMAY
AND ABOVE WASTE.
- HMP PLAN WAS DISCUSSED WITH SEND IN PART II

Contact: BOB BARBERTitle: Plant EngSignature: Bob BarberInspector: AMIR K. GHOLAMISignature: Amir

II, III

OAKLAND FIRE SERVICES AGENCY/OFFICE OF EMERGENCY SERVICES
HAZARDOUS MATERIALS UNIT
505 - 14th Street, Oakland, CA 94612 (510) 238-3938

HAZARDOUS MATERIALS INSPECTION REPORT

12-2017
E

Site Number	Facility Name	Facility Address	Zip Code
68	Dwens - Broadway	3600 Alameda Ave.	01
Inspection Report			
Permission to inspect granted - Yearly insp. P 1 Cooling Tower H-O treatment room Sphagnum CORR. sign			
2 UST for diesel & gas. are going to be removed in 98 - Replace them w/ AET			
Number of personnel handling H.M. need to be updated -			
Emergency Response is under review - A copy will be sent to me			
HMBP already submitted No viol. observed at this time			

Facility Contact/ Print Name:	Inspected By:	<input type="checkbox"/> Insp. Griffin	238-7759
Steve Springer	HEG	<input type="checkbox"/> Insp. Johnson	238-3804
Facility Contact/ Signature:		<input type="checkbox"/> Insp. Craford	238-7758
Steve Springer		<input checked="" type="checkbox"/> Insp. Gomez	238-7253
	Date:	11-4-97	

**OAKLAND FIRE SERVICES AGENCY/OFFICE OF EMERGENCY SERVICES
HAZARDOUS MATERIALS UNIT
505 - 14th Street, Oakland, CA 94612 (510) 238-3938
Hazardous Materials Inspection Report**

Owens Brockmeyer

		UNAUTHORIZED OPERATION	V	C	N	OBSERVATIONS
400	Hazardous Materials Release Response Plans and Inventory (HMRRP/Business Plan)					
401	25507	Failure to report a release/threatened release.			X	
402	25504	Emergency Response Plan inadequate		X		
403	25509	Emergency contacts not provided/current		X		
404	25504	Personnel training program is inadequate		X		
405	25504	Hazardous Materials Chemical Inventory is not attached, is not accurate, or is incomplete		X		
406	25509	Site map is not attached or is not sufficient		X		
408	255339(a)	Acutely Hazardous Materials Registration not filed		X		<i>Need update it</i>
408		Material Safety Data Sheets are not located where the Business Emergency plan (BEP) indicates they should be		X		
409		The BEP indicates the facility maintains hazardous materials response equipment, and the equipment listed is not in place and in operable condition		X		
410		Hazardous materials are not located in the designated areas as indicated on the site map		X		
411		Containers are not clearly labeled with the chemical name and hazard class		X		
412		Containers are in poor condition or are leaking		X		
413		Secondary containment is inadequate		X		
414		Emergency procedures are not adequately posted		X		
415		Monitoring records are not complete or are not current		X		

V=Violation C=Compliance N=Not applicable/addressed/Unknown

OAKLAND FIRE DEPARTMENT/OFFICE OF EMERGENCY SERVICES
Hazardous Materials Management Program
475-14th Street, 9th Floor, Oakland, CA 94612, (510) 238-3938

HAZARDOUS MATERIALS INSPECTION REPORT

STID#:	FACILITY NAME: OWENS - BROCKWAY	PG. 1	OF 1
ADDRESS: 3600 Alameda Ave (01)			
1) Compressed gas is secured & capped at all times			
2) check fire exting. annually			
3) placard facing entryways w/ NFPA (will send info)			
4) Label Ammonia Storage clearly "ANHYDROUS AMMONIA"			
HMRP - pt 1 & 2 in 30 days			
MSDS - up to date 436-2058			
FACILITY CONTACTS/ SIGNATURE: Bob Barber		INSPECTED BY: CRAFORD	
PRINT NAME: BOB BARBER		DATE: 7-31-96	

OAKLAND HAZARDOUS MATERIALS INSPECTION REPORT

Facility Name: OWENS-BROCKWELL
 Address: 3600 ALAMEDA AVE
 Phone: 436-2058
 Contact: B&B BARBER
 ID No.: 866 SIC: _____

Date: 22 Aug 95
 Inspector: LEROY GRIFFIN
 Inspection Time: _____
 Administrative Time: _____

Complaint/Investigation Request

Complainant Name: N/A Phone: _____
 Location of Complaint: _____ Findings: _____

Complaint:

Facility Status: Please check (x) the appropriate boxes relating to chemical storage.

STORED (☒ original containers () smaller () larger () safety cans (☒ existing underground () other _____

MATERIALS (☒ flammable/combustible liquid () chlorinated solvents () water soluble oil () non-soluble oil () waste oil
 (☒ oxy/nitrous compressed gas (☒ flammable compressed gas () chlorinated solvents () toxic/poison (☒ corrosive () oxidizer
 () flammable cryogen liquid () non-flammable cryogen liquid () oxygen-cryogen liquid () other _____

SECONDARY CONTAINMENT (☒ floor/shelf(surface tension) () raised/lipped(berm/tray) (☒ lowered/dike(ump/grate)
 (☒ double walled tank () liner underground () other _____

MONITORING (☒ visual (☒ mechanical () dip stick (☒ vapor monitor () other _____

EMERGENCY EQUIPMENT (☒ fire extinguisher(s) (☒ absorbents (☒ collection containers (☒ response team (☒ gloves
 (☒ disposal suits (☒ posted emergency procedures () other _____

DISPOSAL How are the spent materials and/or wastes handled and disposed of? () no waste () empty containers into trash
 () discharge to ground () discharge to sewer () discharge to pretreatment-sewer () vaporise/vent to air (☒ ship to haz-mat facility
 () recycle () other _____

Health & Safety Code Chapter 6.95 Violations:

Notes	Corrected	Violation
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Needs H.M.S. Permit
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Business Plan/HMMP Inadequacies, check inadequate areas
		<input type="checkbox"/> Facility Information <input type="checkbox"/> Emergency Response Plan <input type="checkbox"/> Record Keeping
		<input type="checkbox"/> Inventory <input type="checkbox"/> Employee Training Plan <input type="checkbox"/> MSDS
		<input type="checkbox"/> Maps/Diagrams <input type="checkbox"/> Emergency Plan <input type="checkbox"/> Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Leaky/damaged containers
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Secondary containment needed
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Evidence of spillage/release
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Incompatible materials need to be separated
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Unlabeled containers
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Unlabeled storage area
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Unsecured area
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Container/vessel needs earthquake bracing/securing
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Storage too close to property line
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Storage too high
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Empty containers need to be labeled/segregated
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Excessive storage of hazardous materials A special room or enclosure will be required. Contact Fire Prevention at 510 238-3851 for permit requirements.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Inadequate aisle width
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Combustible materials stored too close to hazardous materials
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Inadequate ventilation
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Inadequate/faulty secondary containment
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Containers left open - should be closed
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Other _____

OAKLAND FIRE DEPARTMENT/OFFICE OF EMERGENCY SERVICES

Hazardous Materials Management Program

475-14th Street, 9th Floor, Oakland, CA 94612, (510) 238-3938

HAZARDOUS MATERIALS INSPECTION REPORT

STID#: 866	FACILITY NAME: OWENS-BROCKWAY	PG. 1	OF 1
ADDRESS: 3600 ALAMEDA AVE 94601			
1.) PERMISSION TO INSPECT GRANTED			
2.) HMMP part I completed part II due in 30 Days			
3.) Glass manufacture, Type I hazardous waste generated			
4.) Anyd. Ammonia type on site.			
Violation:			
None noted during inspection			
FACILITY CONTACTS/ SIGNATURE: Bob Barber		INSPECTED BY: LEROY GRIFFIN	
PRINT NAME: BOB BARBER		DATE: 22 AUG 95	

white - env. health
yellow - facility
pink - files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320
(510) -

II, III

II.A BUSINESS PLANS (Title 19)

- | | |
|--------------------------|----------|
| 1. Immediate Reporting | 2700 |
| 2. Bus. Plan Stds. | 25503(b) |
| 3. RR Cars > 30 days | 25503.7 |
| 4. Inventory Information | 25504(a) |
| 5. Inventory Complete | 2730 |
| 6. Emergency Response | 25504(b) |
| 7. Training | 25504(c) |
| 8. Deficiency | 25505(a) |
| 9. Modification | 25505(b) |

II.B ACUTELY HAZ. MATLS

- | | |
|---------------------------------|----------|
| 10. Registration Form Filed | 25533(c) |
| 11. Form Complete | 25533(b) |
| 12. RMPP Contents | 25534(c) |
| 13. Implement Sch. Req'd? (Y/N) | |
| 14. OnSite Corresp. Assess. | 25524(c) |
| 15. Probable Risk Assessment | 25534(d) |
| 16. Persons Responsible | 25534(g) |
| 17. Certification | 25534(d) |
| 18. Exemption Request? (Y/N) | 25534(b) |
| 19. Trade Secret Requested? | 25534 |

III. UNDERGROUND TANKS (Title 23)

- | | | |
|---------|----------------------------|-------------|
| General | 1. Permit Application | 25284 (H&S) |
| | 2. Pipeline Leak Detection | 25292 (H&S) |
| | 3. Records Maintenance | 2712 |
| | 4. Release Report | 2651 |
| | 5. Closure Plans | 2670 |

- | | | |
|-------------------------------|-------------------------|--|
| Monitoring for Existing Tanks | 6. Method | |
| | 1) Monthly Test | |
| | 2) Daily Vadose | |
| | Semi-annual groundwater | |
| | One time soil | |
| | 3) Daily Vadose | |
| | One time soil | |
| | Annual tank test | |
| | 4) Monthly Groundwater | |
| | One time soil | |
| 5) Daily Inventory | | |
| Annual tank testing | | |
| Cont pipe leak det | | |
| Vadose/groundwater mon. | | |
| 6) Daily Inventory | | |
| Annual tank testing | | |
| Cont pipe leak det | | |
| 7) Weekly Tank Gauge | | |
| Annual tank testing | | |
| 8) Annual Tank Testing | | |
| Daily inventory | | |
| 9) Other | | |

- | | |
|--------------------|------|
| 7. Precs Tank Test | 2643 |
| Date: | |
| 8. Inventory Rec. | 2646 |
| 9. Soil Testing | 2646 |
| 10. Ground Water | 2647 |

- | | | |
|--------------|--------------------|------|
| New Tanks | 11. Monitor Plan | 2632 |
| | 12. Access, Secure | 2634 |
| | 13. Plans Submit | 2711 |
| | Date: | |
| 14. Air Bufr | 2635 | |
| Date: | | |

Site ID # _____ Site Name OWNERS - BUCKWATER Today's Date 10/14/1993

Site Address 3600 ALAMEDA AVE

City OAKLAND Zip 94601 Phone 436-2058

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- ☐ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
☒ II. Business Plans, Acute Hazardous Materials
☒ III. Underground Tanks

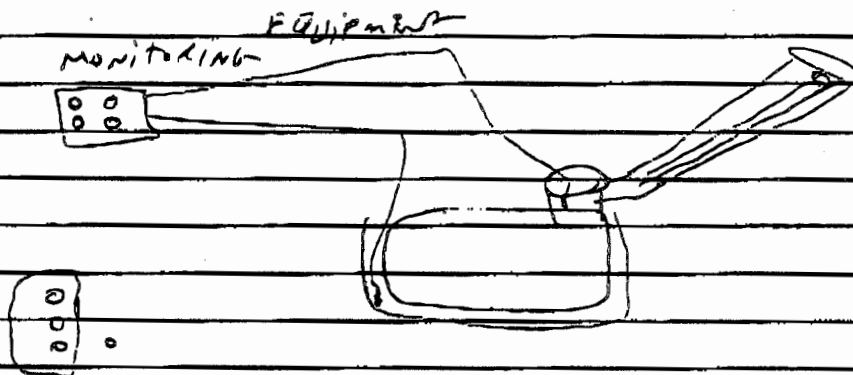
Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

ENVI. ADMIN. H&S
BOB NEAL 7346276
(510)

2 test's double-walled but monitoring

EQUIPMENT IS NOT ADEQUATE.



provide man-made info on monitoring system.

submit H&S P (business plan part II).

filling HAZ-WASTE tanks properly

Contact: BOB BARBER

Title: Plant Eng.

Signature: Bob Barber

Inspector: AMIR K. CHALAMI

Signature: [Signature]

II, III

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

AMIR K. GHOLIAN
80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

(510)

II, III

Site ID # 864 Site Name OWENS-BROOKWAY Today's Date 10/4/93

Site Address 3600 ALAMEDA AVE
City OAKLAND Zip 94601 Phone (510) 436-2058

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- ☒ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
☒ II. Business Plans, Acute Hazardous Materials
☒ III. Underground Tanks

Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

5 yst removed 1986

- THIS FACILITY HAS ONLY 2 yst on site

1 DIESEL, 1 UNLEADED -
BOTH ARE DOUBLE WALLED FIBERGLASS WITH
MONITORING PROBES.

- TYPICAL WASTE (HAZ. WASTE) GENERATED
HERE:

- LUBRICATING OIL WASTE

- 1, 1, 1, THICKENED WASTE (PURE) WASTE

- BRICK WASTE

2 x 500 gal. HAZ. WASTE DRUMS TO HALLWAY
ON ABOVE WASTE.

- HMMF PLANT WAS DISCUSSED WITH SEND IN FACT II

II, III

Contact: BOB BARBER

Title: Plant Eng

Signature: Bob Barber

Inspector: AMIR K. GHOLIAN

Signature: Amir

II.A BUSINESS PLANS (Title 19)

- | | |
|--------------------------|----------|
| 1. Immediate Reporting | 2703 |
| 2. Bus. Plan Stat. | 25503(b) |
| 3. RR Cons > 30 days | 25503.7 |
| 4. Inventory Information | 25504(a) |
| 5. Inventory Complete | 2730 |
| 6. Emergency Response | 25504(b) |
| 7. Training | 25504(c) |
| 8. Deficiency | 25505(a) |
| 9. Modification | 25505(b) |

II.B ACUTELY HAZ. MATLS

- | | |
|---------------------------------|----------|
| 10. Registration Form Filed | 25533(a) |
| 11. Form Complete | 25533(b) |
| 12. RMPP Contents | 25534(a) |
| 13. Implement Sch. Req'd? (Y/N) | |
| 14. OnSite Conseq. Assess. | 25524(c) |
| 15. Probable Risk Assessment | 25534(d) |
| 16. Persons Responsible | 25534(e) |
| 17. Certification | 25534(f) |
| 18. Exemption Request? (Y/N) | 25534(b) |
| 19. Trade Secret Requested? | 25534 |

III. UNDERGROUND TANKS (Title 23)

- | | | |
|----------------------------|-------------|--|
| General | | |
| 1. Permit Application | 25284 (H&S) | |
| 2. Pipeline Leak Detection | 25292 (H&S) | |
| 3. Records Maintenance | 2712 | |
| 4. Release Report | 2651 | |
| 5. Closure Plans | 2670 | |

- | | | |
|-------------------------------|-------------------------|--|
| Monitoring for Existing Tanks | 6. Method | |
| | 1) Monthly Test | |
| | 2) Daily Vadose | |
| | Semi-annual groundwater | |
| | One time soil | |
| | 3) Daily Vadose | |
| | One time soil | |
| | Annual tank test | |
| | 4) Monthly Groundwater | |
| | One time soil | |
| 5) Daily Inventory | | |
| Annual tank testing | | |
| Cont pipe leak det | | |
| Vadose/groundwater mon. | | |
| 6) Daily Inventory | | |
| Annual tank testing | | |
| Cont pipe leak det | | |
| 7) Weekly Tank Gauge | | |
| Annual tank testing | | |
| 8) Annual Tank Testing | | |
| Daily inventory | | |
| 9) Other | | |

- | | |
|-----------------------|------|
| 7. Pre-Test Tank Test | 2643 |
| Date: | |
| 8. Inventory Rec. | 2644 |
| 9. Soil Testing | 2646 |
| 10. Ground Water | 2647 |

- | | | |
|--------------|--------------------|------|
| New Tanks | 11. Monitor Plan | 2632 |
| | 12. Access, Secure | 2634 |
| | 13. Plans Submit | 2711 |
| | Date: | |
| 14. As Built | 2635 | |
| Date: | | |

RCRA COMPLIANCE INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 9
HAZARDOUS WASTE MANAGEMENT DIVISION
WASTE COMPLIANCE EVALUATION

Purpose:	RCRA Compliance Evaluation
Facility:	Owens-Brockway Glass Containers 3600 Alameda Ave. Oakland, CA 94601
EPA ID Number:	CAT000618918
Date of Inspection:	April 9, 1998
EPA Representative:	Clint Seiter Environmental Protection Specialist (415) 744-2141
City of Oakland Fire Services Agency Representative:	Hernan Gomez Hazardous Materials Inspector (510) 238-7253
Facility Representative:	Hank Wiegel Plant Engineer (510) 436-2181
Report Prepared By:	Clint Seiter
Report Date:	June 16, 1998

BACKGROUND

Owens-Brockway Glass Containers, a unit of Owens-Illinois, is a glass manufacturing facility located at 3600 Alameda Avenue, Oakland, CA 94601. It has been in operation for approximately sixty years and employs approximately 500 people. 70% of the facility's product line consists of wine bottles, with the remainder being food and beverage bottles. The facility has three furnaces, each furnace devoted exclusively to a particular color of glass (green, amber and clear (or flint)). Most of the bottles manufactured come from recycled glass (cullet), which is ground down and remelted, with the remainder glass made on site from silica sand mixed with salt cake, soda ash, limestone, and colorizers or de-colorizers. Approximately 875 tons of glass containers are manufactured every working day. Each furnace has an approximate 450 ton holding capacity for molten glass. Furnaces attain a temperature of 2750 degrees to achieve proper melting of the raw materials.

The facility operates forty forklifts, three trucks, one bobcat and two payloaders, which are maintained on the site.

MANUFACTURING PROCESS

Raw materials are blended together in batches in the proper proportions for the desired quality of glass. The batches are transported via closed conveyor belts to the facility furnaces, where the batch material is melted down to molten glass. The molten glass is drawn from the bottom of the furnace, via the throat to feeders. Orifices in the feeders control the amount of molten glass let through, and shears cut off the bottoms of the gobs (discreet units of molten glass) to the desired length (the weight of the gob is determined to an accuracy of one hundredth place). The gobs are first formed into blanks, called "parisons", which are then transferred into molds (two at a time) in machines called shops (there is a total of eight shops in the facility). The molds in each shop can be configured to whatever specifications are required for the particular bottle. Bottles are formed when compressed air is blown into the molds containing the gobs. The bottles then go through an annealing process where they are reheated in lehrs to temperatures up to 1030 degrees and then gradually cooled down. After the bottles are sufficiently cooled, they are sprayed with a poly-coat mixture that increases the bottles' lubricity (scratch resistance).

The bottles are then checked by means of optical equipment for various potential defects (irregular wall thickness, blisters, cracks, specks, etc.) and defective bottles are removed from the assembly line (to be recycled as cullet). The bottles that pass inspections are eventually packaged and transported off to the customers.

WASTES GENERATED

The following wastes are generated at the facility

1. Used Oil: The hot glass is quenched by water as it is ejected out of the shop. This water picks

up lubricating oil from the shop machinery, and before the water is recycled, it is directed to a skim pond. Used oil is skimmed off the pond and diverted to an above-ground tank. Used oil is also generated through routine vehicular maintenance at the vehicle maintenance center.

2. Checker Dust: Dust contaminated with chromium and lead (from crushed cullet) accumulates on the bottom of the exhaust chambers that flank the furnaces. Approximately once every three years this dust is vacuumed out and shipped off to be disposed of as D007 and D008 waste.

3. Methyl Ethyl Ketone (MEK): MEK used as a solvent for bottle coders eventually gets contaminated to the point where it has to be disposed of periodically as a D035 waste.

4. EP dust: Dust from the furnace exhaust is collected on electrostatic plates in the exhaust ducts. It generally is recycled into the batches used to make glass, but occasionally, due to recycling system breakdowns, it must be transported off-site for disposal as a D002 waste.

INVESTIGATION

On April 9, 1998, Clint Seiter, representing the Environmental Protection Agency (EPA), and Hernan Gomez, representing the City of Oakland Fire Services Agency, conducted an unannounced site investigation at the Owens-Brockway facility (EPA ID# CAT000618918), located at 3600 Alameda Ave., Oakland, CA 94601. Upon providing introductions and credentials, the inspectors contacted Mr. Hank Wiegel, the Plant Engineer of the facility. Also in attendance was Mr. Steve Springer, the facility general foreman. The inspectors explained that this was a routine inspection to determine whether or not the facility was in compliance with federal and state regulations concerning the proper management of RCRA and non-RCRA hazardous wastes. The inspection would consist of a walk-through of those areas of the facility where hazardous wastes were handled, with photos taken, followed by a record review.

Pre-Walk-Through Briefing

The facility representatives described the manufacturing process (as described above) to the inspectors. Per these representatives, enough waste is generated to qualify the facility as a Large Quantity Generator (LQG).

Walk-Through Inspection

- Raw Material Delivery

The walk-through inspection began where raw materials that make up the glass are received. Trucks delivering these materials deposit their loads through grates onto conveyor belts. The inspectors noted deposits of salt cake (anhydrous sodium sulfate) packed on the pavement surrounding the grate where this substance is off-loaded (photo 1). (The facility reps have since provided documentation that this has been cleaned up (see Attachment 2).) A post-inspection

review of the MSDS for salt cake has indicated that this substance is not a hazardous material (see Attachment 3). Cullet is kept in bins, segregated by color, until ready for use (photo #2). The conveyor belts, which transport the materials to the furnaces, are enclosed and vacuumed daily (the dust vacuumed up is re-entered into the manufacturing process).

- Used Oil Tanks #1 and #2

As mentioned above, water used to quench hot glass becomes contaminated with lubricating oil from the machinery (photo #3). The water from the quench water bins is routed to two skim sumps (photo #4), where the used oil is skimmed and pumped to two interior above-ground used oil tanks adjacent to the sumps. After the oil has been skimmed off the water in the sumps, the water is pumped to an exterior skim pond. These two used-oil tanks (Tank #1 and Tank #2) are located in the facility basement. Whereas Tank #1 (see photo #5) was correctly identified as containing non-RCRA hazardous waste, it was not marked with the words "Used Oil", as is required by Title 22 §66279.21 (this was subsequently corrected by the facility (see Attachment 2)). All other labeling requirements were in order. Similarly, while Tank #2 was also correctly identified as containing non-RCRA hazardous waste, it was not labeled with the words "Used Oil" (see photo #6). As with Tank #1, this has subsequently been corrected (see Attachment 2). Fire extinguishers were mounted close by and their tags indicated that they had been inspected within an acceptable time frame. Eye washes nearby were in working order.

Per Mr. Wiegel, the tanks have been in operation since the construction of the facility. The two tanks are located on a concrete floor which appears to be in good condition (i.e., showed no signs of cracks). The tanks are elevated approximately three inches above the concrete floor on one end (photos #7 and 8). The floor gradually slopes up until, in both instances, it touches the tank bottoms on the other end. There appears to be adequate containment of the tanks in the event of a leak. Should a leak occur, the oil could be directed to the skim sumps next to the tanks (photo #9).

- Satellite Accumulation Area, Machine Repair Shop

Used oil drum was not marked with the words "Used Oil" (see photos #10 and 11)(this has subsequently been corrected (see Attachment #2)). No other violations were noted.

- Satellite Accumulation Area, Selecting Maintenance Shop

Used oil drum was not marked with the words "Used Oil" (see photo #12) (this has subsequently been corrected (see Attachment #2)).

- Satellite Accumulation Area, Forklift Maintenance Shop

Used oil drum was not marked with the words "Used Oil" (see photos #13 and 14) (this has subsequently been corrected (see Attachment #2)).

- Exterior 4000 Gallon Above-Ground Used Oil Tank

As mentioned above, the water from the skim sumps in the basement is pumped to a skim pond after the used oil is pumped into one of two concrete above-ground tanks located in the basement. Residues of used oil can still be found in the water in the skim pond, and these residues are skimmed off the surface of the pond and pumped into an exterior 4000 gallon above-ground used oil tank. As with the other used oil containers, the tank was not marked with the words "Used Oil" (see photo #15)(this has subsequently been corrected (see Attachment #2)).

Document Review

There were no training records on file, as required by Title 22 §66265.16(d). No discrepancies were found in the manifest review. No other violations noted in facility documentation.

Post Inspection Briefing

The inspectors met with the facility representatives and emphasized the following concerns noted during the inspection:

1. Improper labeling of used oil tanks and containers (since corrected).
2. The salt cake spill in the unloading area (since corrected).
3. Incomplete training records.
4. Potential violations concerning the concrete used oil tanks in the basement.

POTENTIAL VIOLATIONS

Personnel Training

Title 22 §66262.34(a)(4)

A generator may accumulate hazardous waste on-site for 90 days or less without a permit provided that the generator complies with the requirements for owners or operators in Article 4 of chapter 15 and with section 66265.16.

Title 22 §66265.16(d)

The owner or operator shall maintain (training) documents and records at the facility.

There were no training documents at the facility conforming to the requirements of section 66265.16(d)(1)-(4).

Used Oil Labeling

Title 22 §66279.21(b)

Containers and aboveground tanks used to store used oil shall be marked or clearly labeled with the words "USED OIL".

The following facility used oil containers and tanks were not marked with the words "USED OIL" (this has since been corrected by the facility).

- Basement Tanks #1 and #2
- Drum in Machine Repair Shop
- Drum in Selecting Maintenance Shop
- Drum in Forklift Maintenance Shop
- Exterior 4000-gallon Used Oil Tank

ATTACHMENT 1 - PHOTOS



Photo #1- Salt cake deposits on ground in material offloading area

ATTACHMENT 1 - PHOTOS



Photo #2 - Cullet bin

ATTACHMENT 1 - PHOTOS

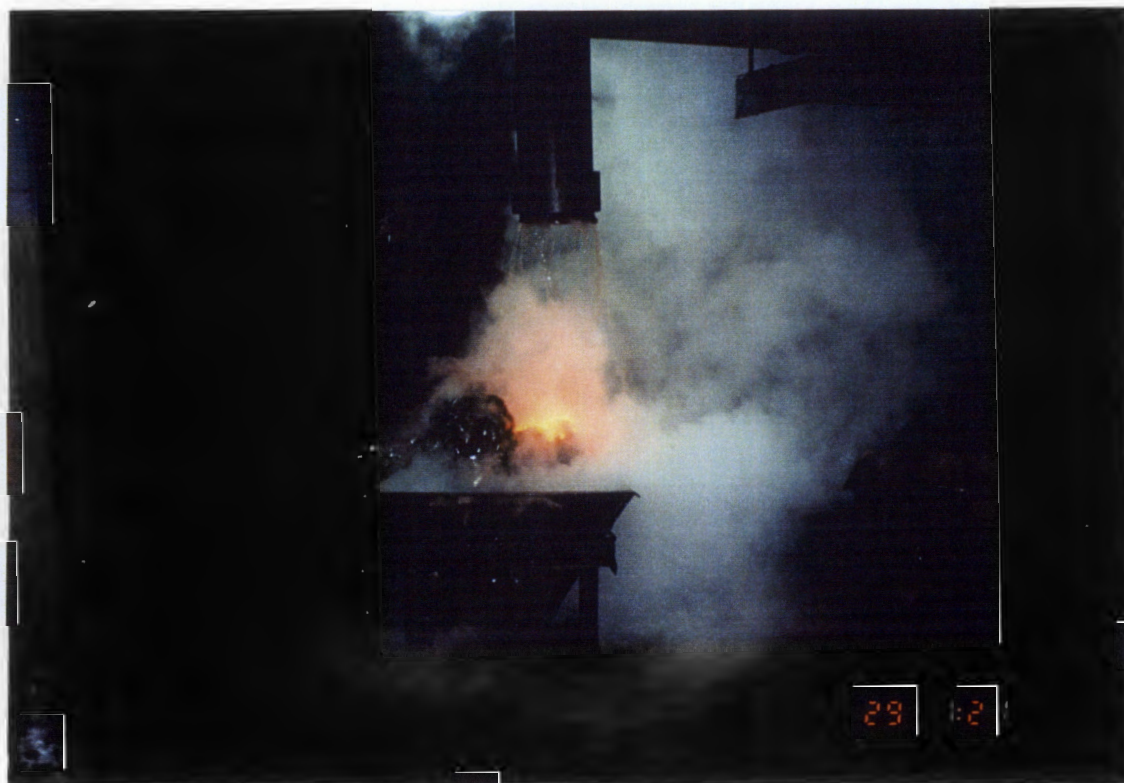


Photo #3 - Hot glass quench water vat

ATTACHMENT 1 - PHOTOS



Photo #4 - Oily wastewater skim pond

ATTACHMENT 1 - PHOTOS



Photo #5 - Concrete used oil tank #1

ATTACHMENT 1 - PHOTOS



Photo #6 - Concrete used oil tank #2

ATTACHMENT 1 - PHOTOS



Photo #7 - Basement used oil tank, showing elevation above floor

ATTACHMENT 1 - PHOTOS



Photo #8 - Basement used oil tank, close-up of elevation above floor

ATTACHMENT 1 - PHOTOS



Photo #9 - Skim sump next to used oil tank

ATTACHMENT 1 - PHOTOS



Photo #10 - Used oil drum (unmarked with the words "Used Oil") in satellite accumulation area in the Machine Repair Shop.

ATTACHMENT 1 - PHOTOS



Photo #11 - Closeup of label of used oil drum in satellite accumulation area in the Machine Repair Shop.

ATTACHMENT 1 - PHOTOS



Photo #12 - Used oil drum (unmarked with words "Used Oil") in Satellite Accumulation Area, Selecting Maintenance Shop

ATTACHMENT 1 - PHOTOS



Photo #13 - Used oil drum (unmarked with words "Used Oil") in Satellite Accumulation Area, Forklift Maintenance Shop

ATTACHMENT 1 - PHOTOS



Photo #14 - Closeup of label on used oil drum in Satellite Accumulation Area, Forklift Maintenance Shop

ATTACHMENT 1 - PHOTOS



Photo #15 - Exterior 4000 Gallon Above-Ground Used Oil Tank, unmarked with the words "Used Oil".

Play Materials 10/1/2014



Area where green liquid was found
(Green liquid on basement floor was
cooling tower water with dye in it to find leak)



Cylinder Storage Basement Area Between A & B Furnaces



D-Furnace Feed HMI



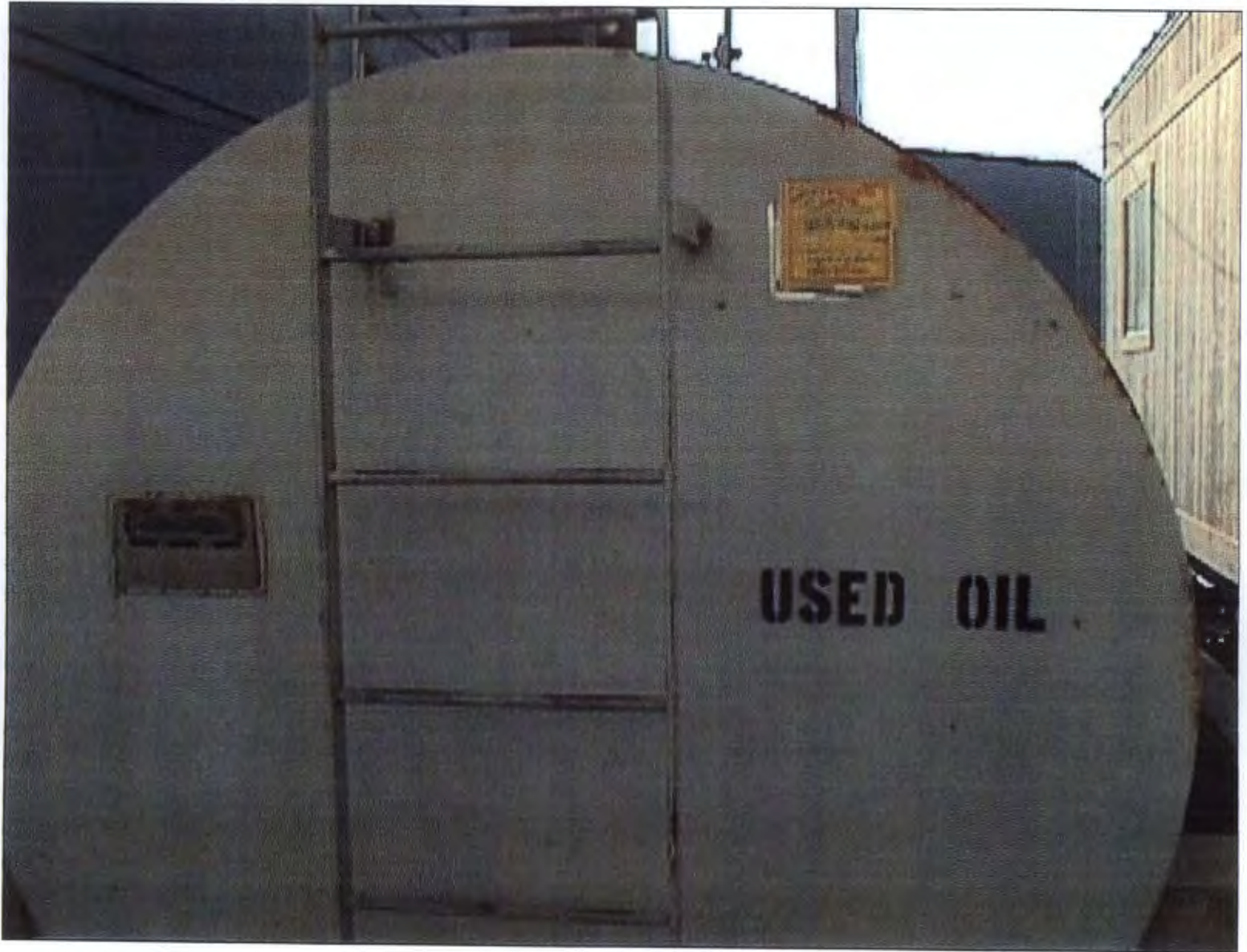
Selecting Maintenance Satellite Storage Area



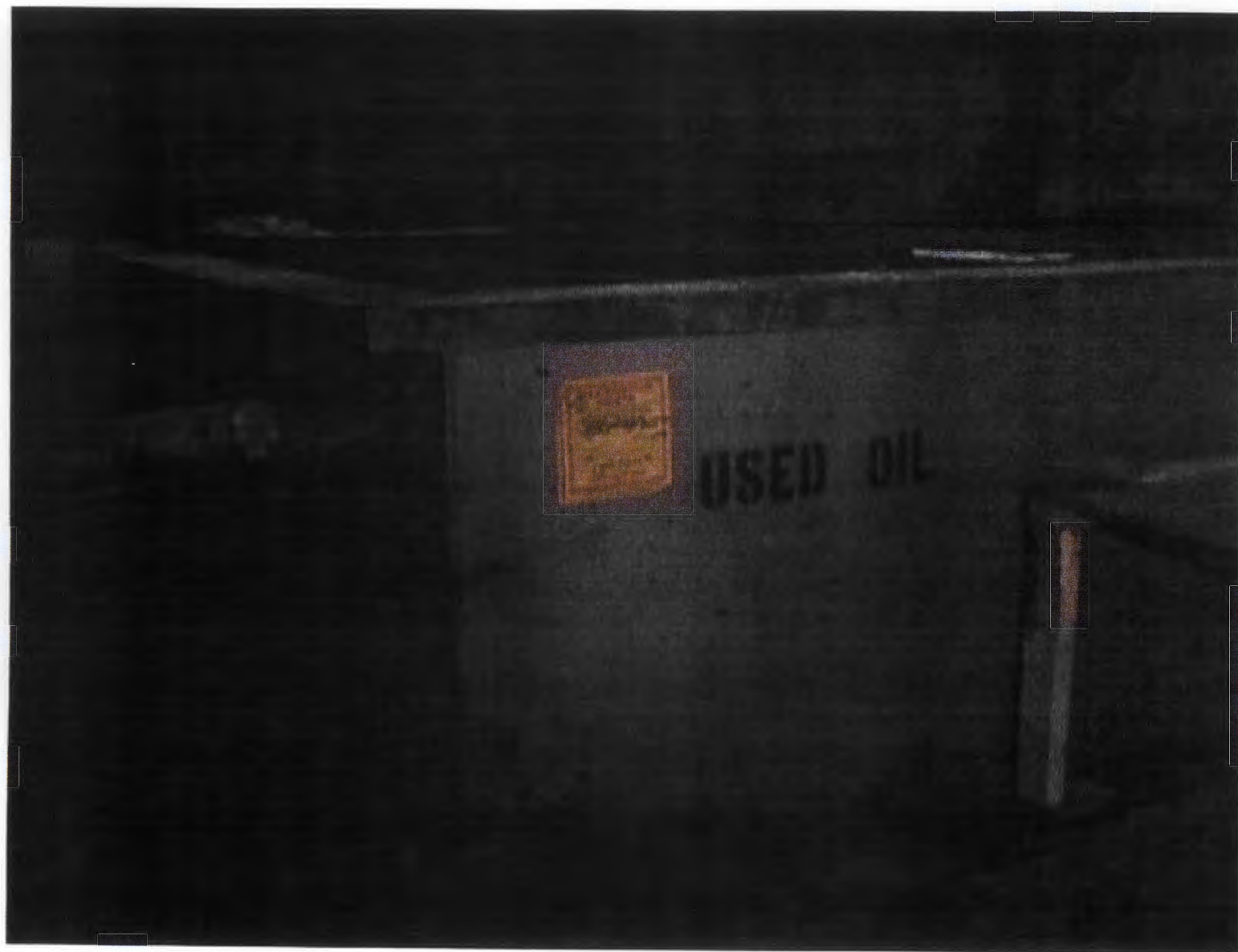
Oil Filter Container



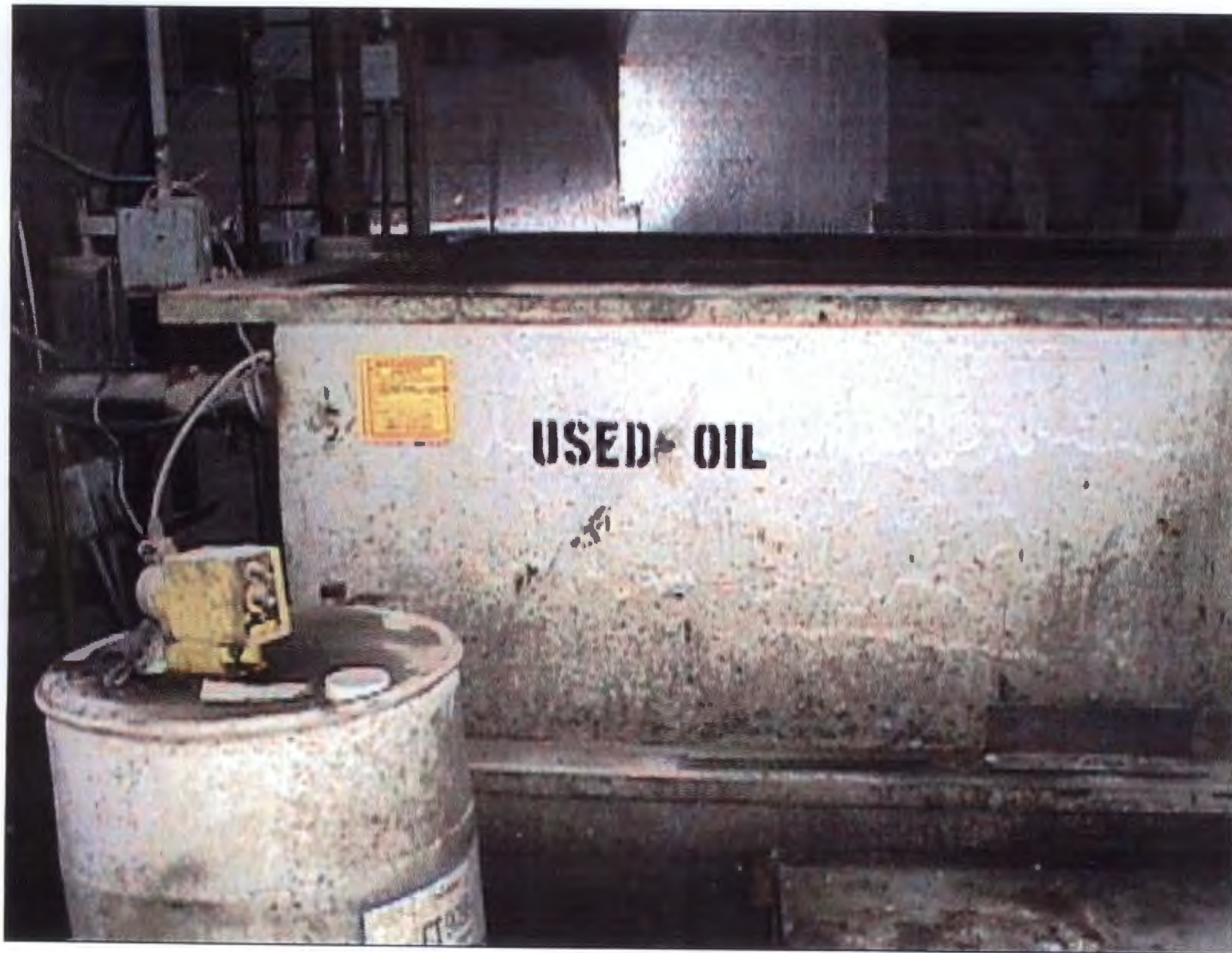
Skim Pond Oil



Used Oil A-Sump Tank



Used Oil D-Sump Tank



ATTACHMENT 3

Material Safety Data Sheet

North American Chemical Company

13200 Main Street
Trona, California 93562



**anhydrous
sodium
sulfate**

For more detailed information on the hazards of this product, write to the address above. Technical Information Bulletin is also available. For emergency information, telephone (819) 372-2291 any time.

PRODUCT IDENTIFICATION

Brand Name TRONA salt cake
..... TRONA anhydrous
..... sodium sulfate
Chemical Name Sodium sulfate
Common Name Salt cake
Formula Na_2SO_4
DOT Proper
Shipping Name Not applicable
DOT Hazard
Class Not applicable
DOT I.D. Number Not applicable
Reportable Quantity (RQ) Not applicable
CAS Number 7757-82-6

PHYSICAL AND CHEMICAL PROPERTIES

State Granular solid
Melting Point C 884
Boiling Point C Not applicable
Color White
Odor None
Bulk Density, lb/cu. ft 80 to 90
Weight Per Gallon Not applicable
Specific Gravity @ 20C Not applicable
Water Solubility, % By Wt. @ 20C 16.3
Flash Point And Method Not applicable
pH Not applicable

HAZARDOUS INGREDIENTS

Chemical Name	Common Name	CAS Number	Hazard
Sodium sulfate	Salt cake	7757-82-6	Mild irritant to eyes, nose, and skin and a strong cathartic.

PHYSICAL HAZARD INFORMATION

Explosive: No Upper Explosive Limit: Not applicable Lower Explosive Limit: Not applicable
Pyrophoric: No
Flammable: No Flammability Class: Not applicable
Combustible: No Organic Peroxide: No
Oxidizer: No Compressed Gas: No
Reactivity: Stable at ordinary and expected temperatures and pressures.

Incompatibilities: Aluminum powder and molten sodium sulfate has exploded.

Hazardous Decomposition: Molten sodium sulfate decomposes, evolving toxic sulfur oxides.

Conditions To Avoid: Temperatures at or above the melting point.

HEALTH INFORMATION

Precautionary Information: **CAUTION!** May cause irritation. May be harmful if swallowed.

Symptoms Of Exposure: Burning sensation in the eyes or nose, coughing or sneezing or rash on the skin.

Restrictive Medical Conditions: Skin disorders may be aggravated by the dehydrating action of this product. Gastrointestinal and kidney disorders may be aggravated by the cathartic action of this product.

PRIMARY ROUTE(S) OF ENTRY

Inhalation (breathing), eye and skin contact and ingestion (swallowing).

TOXICITY INFORMATION

This product is of low toxicity to humans; no lethal doses for humans were reported in the literature; Oral-mouse LD₅₀ 5989 mg/kg; lvn-mouse LDLo 1220 mg/kg.

EXPOSURE LIMITS

OSHA: Not established.
ACGIH: Not established.
Other: ACGIH nuisance dust TLV-TWA is 10 mg/m³ total dust or 5 mg/m³ respirable dust.

Reported As A Potential Carcinogen ☒ Not Applicable ☐ National Toxicology Program
Or Carcinogen ☐ OSHA ☐ International Agency For Research On Cancer

PRECAUTIONS FOR SAFE HANDLING AND USE

Avoid breathing dust.
Avoid contact with eyes and skin.
Use only with adequate ventilation.
Wash thoroughly after handling.

SPILL AND LEAK PROCEDURES

Soil Release: Shovel and sweep up into a container and reclaim for salvage value or dispose of at an industrial waste facility in accordance with federal, state and local regulations.

Water Spill: Disperse and dilute with water jets, propellers or other similar devices.

Air Spill: Let dust settle and dispose of as in Soil Release above.

Occupational Spill: Shovel and sweep up into a container. Reclaim for salvage value, or as permitted, small amounts may be washed to an industrial sewer.

RCRA Waste Number: Not applicable.

ENGINEERING CONTROLS AND PERSONAL PROTECTIVE EQUIPMENT

Ventilation: Use general dilution ventilation techniques.

Respirator: Use NIOSH/MSHA approved dust and mist respirator for exposure above the nuisance dust exposure limit.

Eye Protection: Safety glasses or vented safety goggles.

Gloves: No special requirements. Ordinary work gloves.

Clothing: No special requirements. Wear easily washable clothing. Change daily. Wash clothing before reuse.

Mr. John Verber, esq.

May 28, 1998

Page 2

If you have any questions or need clarifications on any of the items listed above, please contact Mr. David Bacharowski at (213) 266-7546, or Mr. Rick Vergets at (213) 266-7556. You may also contact USEPA's project managers, Mr. Steve Linder at (415) 744-2036 or Mr. Sean Condry at (415) 744-2112 regarding technical issues. Please contact Mr. Jorge Leon at (916) 657-2428 or Ms. Laurie Williams at (415) 744-1387 with respect to any legal issues. We look forward to working with you.

Sincerely,

DAVID A. BACHAROWSKI
Environmental Program Manager
Regional Water Quality Control Board
Los Angeles Region

SEAN T. CONDRY
Project Manager
Waste Management Division
U.S. EPA Region 9

cc: Jorge Leon, Office of Chief Counsel, SWRCB
David Spath, Division of Drinking Water and Environmental Management,
State Department of Health Services
Gary Yamamoto, Drinking Water Field Operations, State Dept. of Health Services
Steve Linder, United States Environmental Protection Agency
Laurie Williams, United States Environmental Protection Agency
Carl Sjoberg, Environmental Programs Division, Los Angeles County Department of
Public Works
Capt. Dennis Wilcox, Underground Storage Tank Program, City of Los Angeles Fire
Dept.
Keith Pritsker, City Attorney's Office, City of Los Angeles
Walter Crone, Ninyo & Moore
Michael Schwennesen, Ecology and Environment, Inc.
Craig Perkins, Environmental & Public Works, City of Santa Monica
Joseph Lawrence, Assistant City Attorney, City of Santa Monica
Rey Rodriguez, Utilities Engineer, City of Santa Monica
Brian Johnson, Underground Storage Tank Program, City of Santa Monica
Barry Groveman, Special Environmental Counsel for City of Santa Monica
Denise Kruger, Southern California Water Company
Rob Saperstein, Counsel for Southern California Water Company
Toby Moore, Mission Geoscience
Angelo Bellomo, Environmental Strategies Corporation
Gino Bianchi-Mosquera, Geomatrix Consultants, Incorporated
Brad Boschetto, Shell Oil Company
Adam Leiter, Wayne Perry, Inc.

ATTACHMENT 1

ATTACHMENT 2

BOB BARBER → CONTACT NAME

Facsimile Transmission Face Sheet



City of Oakland
FIRE DEPARTMENT
OFFICE OF EMERGENCY SERVICES

TO: Clint Sieton FAX: 415-744-1044FROM: Lenny Griffin 510-
PHONE: 238-3938NOTES: pages 1-3 inspection reports Hazardous Wastepage 4-10 " HMRPNO. PAGES INCLUDING THIS: 11 DATE: 4/3/98 TIME: 2:10 PM

CITY OF OAKLAND
FIRE DEPARTMENT
OFFICE OF EMERGENCY SERVICES DIVISION
505 14th Street, 7th Floor
Oakland, CA 94612
PHONE (510) 238-3938
FAX (510) 238-7761

HAZARDOUS WASTE GENERATOR INSPECTION REPORT

FACILITY NAME: Owens Brothers						EPA I.D.#: CAT 000618918					
ADDRESS: 3600 Alameda Ave.						DATE: 1-4-97					
		CODE SECTION		COMPLIANCE				CODE SECTION		COMPLIANCE	
		YES	NO	N/A				YES	NO	N/A	
1. IDENTIFICATION NUMBER						6. CONTINGENCY/BUSINESS PLAN					
(a) Obtained EPA I.D. Number	66262.12(a)	X			(a) Contingency Plan Complete	66265.52(a-f)		X			
(b) Transporter and TSDF Have EPA I.D.#	66265.12(c)	X			(b) Copy of Plan on Site	66265.53					
2. PRE-TRANSPORT REQUIREMENTS						(c) Contingency/Business Plan Submitted					
(a) HW Containers Labeled	66262.31		X		(d) Plan Amended as Necessary	66265.54					
(b) HW Label Properly Filled Out	66262.32(14)				(e) ER Coordinator Familiar w/Plan	66265.55		X			
(c) HW Accumulation of Time Not Exceeded	66262.34 (c)				7. PREPAREDNESS AND PREVENTION						
(d) Accumulation Date Indicated	66262.34(f)				(a) Internal Comm./Alarm Provided	66265.32(a)		X			
(e) Description of HW Contents	66262.34(f)				(b) A Device to Call Outside Provided	66265.32(b)					
(f) HW Containers in Good Condition	66265.171				(c) Spill Control Systems Available	66265.32(c)					
(g) HW Compatible with Containers	66265.172				(d) Maintain ER Equipment	66265.33					
(h) HW Containers Closed/Sealed	66265.173				(e) Security Measure	66265.14					
(i) HW Storage Area Inspected Weekly	66265.174				(f) Maintain Adequate Aisle Space	66265.35					
(j) Tank & Tank Equip. Inspected Daily	66265.195				(g) Arrangements w/Local Agencies	66235.37		X			
(k) Incompatible HW in Separate Containers	66265.199				8. EMERGENCY PROCEDURES						
(l) Proper Management of Used Oil Filters	66266.130			X	(a) Character/Source/Extent of ER Determined	66265.56					X
3. RECORDKEEPING AND REPORTING						(b) Proper Agencies Notified of Health Hazard	66265.56				X
(a) HW Analysis Kept 5 Yrs./Land Disposal	66262.11			X	(c) ER Data Submitted to DTSC & LIA	66265.56					X
(b) Biennial Report Submitted to State	66262.41			X	(d) Uncontrol. Release HW Property Handled	66235.56					X
4. MANIFEST/RECEIPTS						9. WASTE STREAMS					
(a) HW Shipped with Proper Manifest	66262.20		X		(a) Waste Oil			X			
(b) Manifests Kept for Last 3 Years	66262.40(a)				(b) Non-Halogenated Solvents/Parts Cleaner			X			
(c) HW Analysis Kept for 3 Years	66262.40(c)			X	(c) Ethylene Glycol/Antifreeze						
(d) Manifest Received from TSDF	66262.42	X			(d) Oily Sludges						
5. TRAINING						(e) Other:					
(a) Training Program Provided	66265.16		X		(f) Other:						
(b) Personnel Trained & Supervised	66265.16(b)				(g) Other:						
(c) HW Personnel Trained within 6 Months	66265.16(b)				(h) Other:						
(d) Training Records Kept on Site	66265.16(d)										
(e) Training Records Maintained for 3 Years	66265.16(e)				All above code sections refer to the California Code of Reg. Title 22						
(f) Training Records Complete	66265.16(1.2)										
Source Reduction Plan Completed	25244.19			X	Pollution Prevention			Health & Safety Code			
REMARKS:											

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Inspection Form

II, III

IIA BUSINESS PLANS (Title 19)

- | | |
|--------------------------|----------|
| 1. Immediate Reporting | 2703 |
| 2. Bus. Plan Stds. | 25503(b) |
| 3. RR Cars > 30 days | 25505.7 |
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II.B ACUTELY HAZ. MATLS

- | | |
|---------------------------------|----------|
| 10. Registration Form Filed | 25533(a) |
| 11. Form Complete | 25533(b) |
| 12. RMPP Contents | 25534(c) |
| 13. Implement Sch. Req'd? (Y/N) | |
| 14. On-Site Corresp. Assess. | 25524(c) |
| 15. Probable Risk Assessment | 25534(d) |
| 16. Persons Responsible | 25534(e) |
| 17. Certification | 25534(f) |
| 18. Exemption Request? (Y/N) | 25536(b) |
| 19. Trade Secret Requested? | 25538 |

III. UNDERGROUND TANKS (Title 23)

- | | | |
|-------------------------------|----------------------------|-------------|
| General | 1. Permit Application | 25284 (H&S) |
| | 2. Pipeline Leak Detection | 25292 (H&S) |
| | 3. Records Maintenance | 2712 |
| | 4. Release Report | 2651 |
| | 5. Closure Plans | 2670 |
| Monitoring for Existing Tanks | 6. Method | |
| | 1) Monthly Test | |
| | 2) Daily Vadose | |
| | Semi-annual groundwater | |
| | One time soils | |
| | 3) Daily Vadose | |
| | One time soils | |
| | Annual tank test | |
| | 4) Monthly Groundwater | |
| | One time soils | |
| 5) Daily Inventory | | |
| Annual tank testing | | |
| Cont pipe leak det | | |
| Vadose/groundwater mon. | | |
| 6) Daily Inventory | | |
| Annual tank testing | | |
| Cont pipe leak det | | |
| 7) Weekly Tank Gauge | | |
| Annual tank testing | | |
| 8) Annual Tank Testing | | |
| Daily Inventory | | |
| 9) Other | | |
| New Tanks | 7. Precis Tank Test | 2643 |
| | Date: | |
| | 8. Inventory Rec. | 2644 |
| | 9. Soil Testing | 2646 |
| | 10. Ground Water | 2647 |
| | 11. Monitor Plan | 2632 |
| | 12. Access. Secure | 2634 |
| | 13. Plans Submit | 2711 |
| | Date: | |
| | 14. As Built | 2635 |
| Date: | | |

Rev 6/88

Site ID # 8106 Site Name DWENS BRICKWAY Today's Date 4/11/97

Site Address 3600 ALABAMA

City OAK Zip 94601 Phone 438-2058

MAX AMT stored > 500 lbs. 55 gal. 200 cft.?

Inspection Categories:

- ☒ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
☒ II. Business Plans, Acute Hazardous Materials
☒ III. Underground Tanks

Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

— PROVIDE RMPP MONITORING BOOK FOR
THE U.S.T. AS DISCUSSED
— COMPLETE AND SEND IN PART II
HMBP AS DISCUSSED
— LABEL & FILL IN LABEL HAZ. WASTE
CONTAINERS
— SEND IN AIRC, FORM B.D. 157
— COMPLY WITHIN 30 DAYS!

Contact: _____

Title: _____

Signature: Ben Barber

Inspector: _____

Signature: [Signature]

II, III

white - env. health
yellow - facility
pink - files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

AMIR K. GHOLAMI
80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

(510)

II, III

Site ID # 864 Site Name OWENS-BROOKWAY Today's Date 10/4/93

II.A BUSINESS PLANS (Title 19)

- | | |
|--------------------------|----------|
| 1. Immediate Reporting | 2703 |
| 2. Bus. Plan Stds. | 25503(b) |
| 3. RR Cars > 30 days | 25503.7 |
| 4. Inventory Information | 25504(a) |
| 5. Inventory Complete | 2730 |
| 6. Emergency Response | 25504(b) |
| 7. Training | 25504(c) |
| 8. Deficiency | 25505(a) |
| 9. Modification | 25505(b) |

II.B ACUTELY HAZ. MAT'L

- | | |
|---------------------------------|----------|
| 10. Registration Form Filed | 25533(a) |
| 11. Form Complete | 25533(b) |
| 12. RMPP Contents | 25534(a) |
| 13. Implement Sch. Req'd? (Y/N) | |
| 14. On-Site Consq. Assess. | 25524(c) |
| 15. Probable Risk Assessment | 25534(d) |
| 16. Persons Responsible | 25534(g) |
| 17. Certification | 25534(h) |
| 18. Exemption Request? (Y/N) | 25536(b) |
| 19. Trade Secret Requested? | 25538 |

III. UNDERGROUND TANKS (Title 23)

- | | | |
|---------|----------------------------|-------------|
| General | 1. Permit Application | 25284 (H&S) |
| | 2. Pipeline Leak Detection | 25292 (H&S) |
| | 3. Records Maintenance | 2712 |
| | 4. Release Report | 2681 |
| | 5. Closure Plans | 2670 |

- | | | |
|------------------------------|-------------------------|--|
| Monitoring for Leaking Tanks | 6. Method | |
| | 1) Monthly Test | |
| | 2) Daily Vadose | |
| | Semi-annual groundwater | |
| | One time soil | |
| | 3) Daily Vadose | |
| | One time soil | |
| | Annual tank test | |
| | 4) Monthly Groundwater | |
| | One time soil | |
| New Tanks | 5) Daily Inventory | |
| | Annual tank testing | |
| | Cont pipe leak det | |
| | Vadose/groundwater mon. | |
| | 6) Daily Inventory | |
| | Annual tank testing | |
| | Cont pipe leak det | |
| | 7) Weekly Tank Gauge | |
| | Annual tank testing | |
| | 8) Annual Tank Testing | |
| Daily Inventory | | |
| 9) Other | | |

- | | |
|--------------------|------|
| 7. Precs Tank Test | 2643 |
| Date: | |
| 8. Inventory Rec. | 2644 |
| 9. Soil Testing | 2646 |
| 10. Ground Water | 2647 |

- | | |
|--------------------|------|
| 11. Monitor Plan | 2632 |
| 12. Access, Secure | 2634 |
| 13. Plans Submit | 2711 |
| Date: | |
| 14. As Built | 2635 |
| Date: | |

Rev 5/88

Site Address 3600 ALAMEDA AVE
City OAKLAND Zip 94601 Phone (510) 436-2058

MAX AMT stored > 500 lbs. 55 gal. 200 cft.?

Inspection Categories:

- ☒ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
☒ II. Business Plans, Acute Hazardous Materials
☒ III. Underground Tanks

Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

5 UR REMOVED 1986
- THIS FACILITY HAS ONLY 2 UR ON SITE
1 DIESEL, 1 UNLEADED -
BOTH ARE DOUBLE WALLED FIBERGLASS WITH
MONITORING PROBES -
- TYPICAL WASTE (HAZ. WASTE) GENERATED
ARE -
- LUBRICATING OIL WASTE
- 1, 1, 1, TRICHLOROETHANE (PCE) WASTE
- BATTERY WASTE -
- 1 + COMP. HAZ. WASTE WAGERS TO KALLAWAY
AND ABOVE WASTE.
- HAMP PLANT WAS DISCUSSED WITH SEND IN PART II

Contact: BOB BARBER

Title: Plant Eng

Signature: Bob Barber

Inspector: AMIR K. GHOLAMI

Signature: Amir

II, III

OAKLAND FIRE SERVICES AGENCY/OFFICE OF EMERGENCY SERVICES
HAZARDOUS MATERIALS UNIT
505 - 14th Street, Oakland, CA 94612 (510) 238-3938

HAZARDOUS MATERIALS INSPECTION REPORT

12-2019

Site Number	Facility Name	Facility Address	Zip Code
68	Dwens - Broadway	3600 Alameda Ave.	01
Inspection Report			
Permission to inspect granted - Yearly insp. P 1 Cooling Tower H ₂ O treatment room Scheduling CORR. sign			
2 UST for diesel & gas. are going to be removed in 98 - Replace them w/ AET			
Number of personnel handling H.M. need to be updated -			
Emergency Response is under review - A copy will be sent to me			
HMBP already submitted No viol. observed at this time			

Facility Contact/ Print Name:	Inspected By:	<input type="checkbox"/> Insp. Griffin	238-7759
Steve Springer	HEG	<input type="checkbox"/> Insp. Johnson	238-3804
Facility Contact Signature:		<input type="checkbox"/> Insp. Craford	238-7758
Steve Springer		<input checked="" type="checkbox"/> Insp. Gomez	238-7253
	Date:	11-4-97	

OAKLAND FIRE SERVICES AGENCY/OFFICE OF EMERGENCY SERVICES
HAZARDOUS MATERIALS UNIT
505 - 14th Street, Oakland, CA 94612 (510) 238-3938
Hazardous Materials Inspection Report

Owens' Brickmeyer

		UNAUTHORIZED OPERATION	V	C	N	OBSERVATIONS
400	Hazardous Materials Release Response Plans and Inventory (HMRRP/Business Plan)					
401	25507	Failure to report a release/threatened release.			X	
402	25504	Emergency Response Plan inadequate		X		
403	25509	Emergency contacts not provided/current		X		
404	25504	Personnel training program is inadequate		X		
405	25504	Hazardous Materials Chemical Inventory is not attached, is not accurate, or is incomplete		X		
406	25509	Site map is not attached or is not sufficient		X		
408	255339(a)	Acutely Hazardous Materials Registration not filed		X		<i>Need update it</i>
408		Material Safety Data Sheets are not located where the Business Emergency plan (BEP) indicates they should be		X		
409		The BEP indicates the facility maintains hazardous materials response equipment, and the equipment listed is not in place and in operable condition		X		
410		Hazardous materials are not located in the designated areas as indicated on the site map		X		
411		Containers are not clearly labeled with the chemical name and hazard class		X		
412		Containers are in poor condition or are leaking		X		
413		Secondary containment is inadequate		X		
414		Emergency procedures are not adequately posted		X		
415		Monitoring records are not complete or are not current		X		

V=Violation C=Compliance N=Not applicable/addressed/Unknown

OAKLAND FIRE DEPARTMENT/OFFICE OF EMERGENCY SERVICES
Hazardous Materials Management Program
475-14th Street, 9th Floor, Oakland, CA 94612, (510) 238-3938

HAZARDOUS MATERIALS INSPECTION REPORT

STID#:	FACILITY NAME: OWENS - BROCKWAY	PG. 1	OF 1
ADDRESS: 3600 Alameda Ave (o1)			
1) Compressed gas is secured & capped at all times			
2) check fire exting. annually			
3) placard facing entryways w/ NFPA (all side info)			
4) Label Ammonia Storage clearly "ANHYDROUS AMMONIA"			
HMBP - pt 1 & 2 in 30 days			
MSDS - up to date 436-2058			
FACILITY CONTACTS/ SIGNATURE: Bob Barber		INSPECTED BY: CRAFT	
PRINT NAME: BOB BARBER		DATE: 7-31-96	